

Modern Slavery Statement



Introduction

This statement sets out the actions taken by Intersurgical to identify and address potential risks of modern slavery and human trafficking within our business operations and supply chains. It also outlines the measures implemented to help ensure that slavery and human trafficking do not occur in any part of our organisation or supply chain.

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and applies to all legal entities within the Intersurgical Group. It covers the financial year from 1st January 2025 to 31st December 2025.

Intersurgical recognises its responsibility to take a robust and proactive approach to preventing modern slavery. We are committed to conducting business ethically and with integrity, and implementing effective systems and controls to safeguard against all forms of modern slavery within our operations and supply chains.

We maintain a zero-tolerance approach to human trafficking, forced labour, debt bondage, and child labour, and are committed to supporting the prevention, detection, and elimination of modern slavery in all its forms.

The due diligence measures and procedures implemented to support this commitment are outlined below.

Organisation's Structure

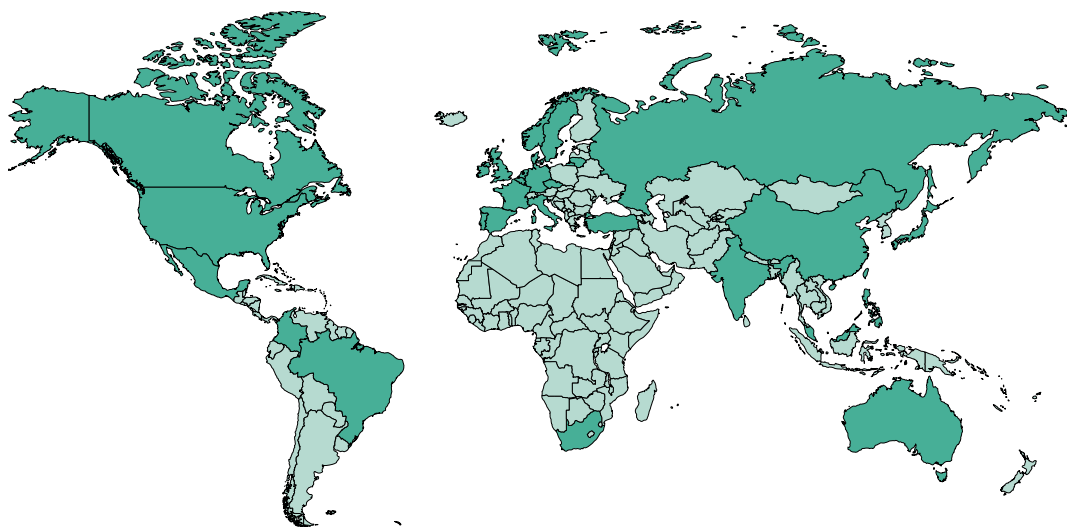
Intersurgical was formed in 1982, based in the UK, producing a limited number of products for supply to the UK hospital market. Over 40 years following a constant programme of new product and market development, we now provide an extensive portfolio and are one of the market leaders for high quality respiratory care products for the hospital sector worldwide.

Our product range has remained focused in anaesthesia and respiratory care providing solutions across airway management, anaesthesia, critical care and oxygen and aerosol therapy.

To serve our global customers, we have established a network of 28 directly operated subsidiary sales offices, complemented by partnerships with more than 90 specialist distributors.

As our markets and portfolio have expanded, so have our production facilities. Today we operate seven global manufacturing sites based in Pabrade and Visaginas (Lithuania), Wokingham (UK Head Office), Mirandola (Italy), Penang (Malaysia), Indianapolis (USA) and Changzhou (China).

Each of our manufacturing sites focus on specific areas of the business, providing local expertise and experience. This extensive infrastructure has enabled us to extend our reach across international markets, ensuring reliable access to our products and services for customers around the world.



Direct subsidiaries

UK	Canada	Denmark	Ireland	Malaysia	Portugal	Sweden
Australia	China	France	Italy	Mexico	Russia	Taiwan
Benelux	Colombia	Germany	Japan	Norway	South Africa	Turkey
Brazil	Czech Republic	India	Lithuania	Philippines	Spain	USA

Network of over 90 speciality distributors

Manufacturing sites

Our Goal / Purpose

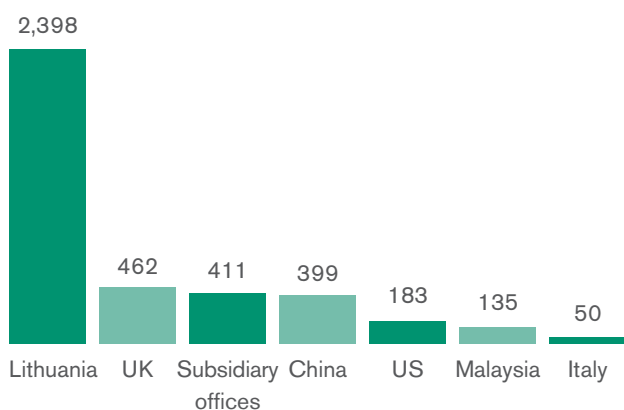
To deliver trusted solutions that enable exceptional patient care, in a work environment where our people can thrive. We are committed to being a respected healthcare partner driven by quality, innovation and environmental responsibility.

Driven by **Quality**, Defined by **Innovation**, Built on **Trust**.

Workplace Demographics

Intersurgical has experienced steady workforce growth, reflecting both business expansion and the opening of new subsidiary offices.

Number of employees by site



Total employees in 2025:

4,038

Preventing Modern Slavery within our Workforce

To prevent modern slavery within our own operations, we focus on establishing ethical recruitment and employment practices, including transparent employment terms, fair pay and working hours, employee rights, equality and safe working conditions.

Whenever possible, we hire directly, and in the event we engage with external support we ensure third-party labour providers are adequately vetted to reduce risks associated with indirect hiring, such as ensuring the recruitment fees are not paid by the worker, or other coercive practices.

Our commitment includes regular training for all employees and managers on modern slavery awareness, and reporting mechanisms, ensuring that our teams can identify and respond to any signs of exploitation.

We also prioritise employee support and well-being, offering access to Employee Assistance Programmes. Confidential grievance channels, supported by whistle-blower protections allow employees to report concerns without fear of retaliation.

We welcome employee feedback and foster a supportive and inclusive culture where every team member is valued and encouraged to contribute their ideas, thoughts, and opinions. Our open-door policy ensures that everyone's voice is heard and respected.

Relevant policies

Intersurgical has a number of policies, procedures and processes which are aimed at helping us to identify and mitigate the risk of modern slavery.

- **Whistleblowing policy:** We encourage all our workers, customers and other business partners, including suppliers to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee handbook / code of conduct:** We have a code of conduct for employees in the form of a staff handbook which sets out our expectations of how all employees should behave along with their employment rights. This handbook also includes information on ethical business practices, grievance, whistleblowing, corporate social responsibility, diversity equality & inclusion, bullying & harassment, and health & safety.
- **Recruitment & Training:** Our recruitment and training policies are embedded within our Quality Management System. Our recruitment policy includes specific rules relating to modern slavery, including the propitiation of child labour, retention of right to work documentation, and the use of agencies.

In addition to these policies, all Employees are issued with a contract of employment setting out the terms relating to their employment. These contracts include confirmation of above minimum wage pay, the rights to terminate their employment, and rules on overtime.

Training and Awareness

Ensuring our teams are aware and trained on modern slavery is vital to ensuring our success in our goal of ensuring our operations and supply chains are free from modern slavery.

We require all staff in the UK, and those globally working in Management, Supply Chain and HR to complete training on modern slavery and whistleblowing, to enable them to identify and promptly raise any concerns they may have.

To further support training on modern slavery, we recognise Anti-Slavery Awareness Day annually and use the opportunity to engage with our teams on the topic.

This serves as an opportunity to reinforce awareness, act as a reminder of the ongoing risks of modern slavery, and reconfirm our commitment to ethical labor practices. As part of this initiative, we highlight key principles of the Modern Slavery Act 2015, educate employees on how to identify and report concerns, and provide information on both internal reporting channels and external support helplines.

Risk Assessment

We are committed to identifying and mitigating the risks of modern slavery across our operations and supply chain. Each year, we conduct a risk assessment to evaluate where modern slavery risks may exist within our business activities, considering factors such as industry, geographic location and supplier practices. Risks are scored using a likelihood and impact matrix, allowing us to prioritise where mitigation action is most needed.

Risks identified through the assessment are assigned mitigation actions, which are monitored and reviewed as part of the following year's assessment to evaluate progress.

Our Human Resources (HR) and Environment, Social and Governance (ESG) committee jointly oversee and review this assessment on an annual basis. In addition to our annual review, we remain attentive to emerging risks throughout the year, ensuring our approach remains responsive to changes in our operating environment.

Preventing Modern Slavery in our Supply Chain

Our supply chain primarily consists of partners sourcing and providing raw materials and components to meet the requirements of our medical devices.

As part of our commitment to identify and mitigate the risk of modern slavery in our supply chain we have the following measures in place:

- **Capitalise Procedures:** Procurement and Supplier procedures are embedded within our Quality Management System carefully describing the process for supplier selection, evaluation and audit.
- **Supply Chain Mapping:** We regularly map our supply chain broadly to assess geographical risks of modern slavery using the Walk Free Global Slavery Index.
- **Risk Assess:** We conduct new supplier assessments to evaluate and ensure their practices meet Intersurgical's requirements. This assessment provides a modern slavery risk grade which will help to guide corrective actions.
- **Supplier Handbook:** We provide all suppliers with a supplier handbook/code of conduct setting clear expectations, outlining compliance requirements, and supporting due diligence efforts to prevent exploitation within the supply chain.
- **Review:** We conduct regular reviews of supplier assessment in order to track the work they are doing to prevent, detect and eliminate modern slavery and capture any risks to changing geographical locations.
- **Audit:** We conduct supplier audits, prioritising high risk suppliers, to evaluate their management of modern slavery, and ensure their practices continue to meet Intersurgical's requirements.
- **Whistleblowing Procedure:** We encourage all our workers, customers and other business partners, including suppliers to report any concerns related to the direct activities, or the supply chains of our organisation.

This includes any circumstances that may give rise to an enhanced risk of modern slavery. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Corrective Actions:** Where necessary we will provide guidance on corrective actions, and training, to high risk suppliers.

Intersurgical will not support or deal with any business knowingly involved in modern slavery, and are delighted to report that following the steps above no instances of modern slavery have been highlighted.

Monitoring & Review

This Modern Slavery Statement, together with the supporting policies, procedures, and KPI framework, is formally reviewed on an annual basis to ensure continued effectiveness and alignment with the requirements of the UK Modern Slavery Act 2015 and evolving business operations.

Relevant findings, progress updates, and improvement actions are shared with the Senior Management Team to support governance, accountability, and oversight.

Where areas requiring improvement are identified, corrective actions and follow-up activities are implemented and monitored through the appropriate business functions.

Remedy

Any suspicions, concerns or complaints of actual, or suspected instances of modern slavery in our operations or supply chain must be reported via our whistleblowing procedure.

Where a complaint is raised Intersurgical will initiate a prompt investigation to understand the nature and extent of the alleged incident.

If the complaint is substantiated, immediate action will be taken to safeguard affected individuals and rectify any harmful practices. This may involve working directly with suppliers to end exploitative conditions, providing support to impacted workers, or in serious cases, or where improvements are not made to end such practices, ceasing business with non-compliant partners.

Additionally, we will continually review and strengthen our policies and training to prevent recurrence, ensuring accountability and continuous improvement in combatting modern slavery.

Key Performance Indicators

Intersurgical monitors the effectiveness of its approach to preventing modern slavery through the regular review of KPIs relating to recruitment controls, employee training whistleblowing, agency compliance, and ethical labour practices.

KPI performance is reviewed quarterly by the HR & ESG committee to assess the effectiveness of existing controls, identify emerging risks, monitor trends, and support continuous improvement activities.

Key messages

The following key messages highlight our progress during 2025 and demonstrate the actions taken by Intersurgical to strengthen our approach to preventing modern slavery and promoting ethical practices across our operations and supply chains.

- **Strong recruitment controls embedded:**

Core safeguarding processes (age verification, right-to-work checks, minimum wage compliance, and employment contracts) are consistently maintained at 100%, ensuring modern slavery risks are effectively mitigated at the point of hire.

- **Rapid improvement in workforce awareness:**

Expansion of Whistleblowing and Modern Slavery training in 2025 resulted in significant uptake, with UK completion rates increasing to 97% by year-end, strengthening employee awareness and reporting capability.

- **Governance-driven performance improvement:**

Where structured interventions were applied within our recruitment procedure to formalise the due diligence process associated with agency hiring, UK compliance improved rapidly from 50% to 100% within the reporting cycle.

- **Residual global training gap:** While UK training performance is strong, global rollout of Modern Slavery training for HR, Managers, and Purchasing remains in progress, creating a continued area of development for consistent global coverage.

- **Agency reliance remains above target threshold:**

Agency-supported hiring exceeded the <5% target during the year, reaching a peak of 14.28% and stabilising at approximately 11%. This was primarily driven by the use of agency partners to support the recruitment of permanent roles in areas where direct hiring activity has been more challenging.

2026 KPIs

The table below summarises our 2025 target, 2025 actual, and our 2026 targets

KPI	Purpose	2025 target	2025 actual	2026 target
Number of whistleblowing reports relating to modern slavery incidents.	To record the number of modern slavery incidents on an annual basis, including investigation, resolution and corrective actions.	<2	0	As required
Completion of a review into the Prevalence, Vulnerability and Government Response (Walk Free Global Slavery Index) to Modern Slavery in each country Intersurgical has direct Operations.	To understand, and respond to the geographical risk of each country we operate in to help better form local risk assessments.	100%	100%	100%
Intersurgical's risk level of modern slavery in our direct operations based on geographical risk and the type of work being performed.	To understand the combined risk of our own operations taking into consideration the geographical risk and the risk based on the work being performed.	<0.3	0.268	<0.3
Percentage of new employees to be issued with a new contract of employment.	To ensure that all new hires are provided with a formal, legally binding agreement that outlines the terms and conditions of their employment.	100%	100%	100%
Percentage of Workers with age verification checks conducted before job offers are made.	To reduce any potential risk of modern slavery before employment commences.	100%	100%	100%
Percentage of new employees with the relevant right to work documentation.	To verify compliance with legal requirements and prevent unauthorised employment.	100%	100%	100%
Percentage of original right to work documentation retained.	To demonstrate that employees are never required to surrender personal identification documents and that any necessary verification processes are conducted securely and without inappropriate retention of original documentation.	Not formally tracked	Not formally tracked	0%
NEW				
Minimum age of new employees. (excluding educational placements).	To ensure compliance with employment regulations and company policies on hiring age requirements.	>18	18	<18
Percentage of new employees paid at or above the minimum wage.	To ensure fair and legal compensation practices for all new hires.	100%	100%	100%
Percentage of new employees introduced and recruited via recruitment agency.	To monitor the proportion of hires made through recruitment agencies while encouraging direct recruitment where possible and maintaining appropriate operational support for hard-to-fill roles.	<5%	11%	10%
Percentage of recruitment agencies complying with no-fee policies for candidates.	To ensure that agency hires are sourced through agencies that meet Intersurgical's ethical and compliance standards.	100%	100%	100%
Percentage of agency filled roles supported by 'approved' agencies.	To ensure that agency hires are sourced through agencies that meet Intersurgical's ethical and compliance standards.	100%	83%	100%
Percentage of all staff within UK operations who have completed Modern Slavery Training.	To equip staff to recognise, prevent, and report potential exploitation, fostering a more vigilant and ethically responsible workforce.	98%	97%	100%
Percentage of all staff within UK operations who have completed Whistleblowing Training.	To empower staff to report concerns or misconduct confidently and safely, fostering a culture of transparency and accountability.	98%	95%	100%



Charles Bellm

Managing Director

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The manufacturer Intersurgical Ltd is certified to ISO 14001:2015, ISO 9001:2015, ISO 13485:2016 and MDSAP

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