

Tritos Medical – Modern Slavery and Human Rights Policy

Policy Statement

Tritos Medical is committed to conducting all business activities ethically, responsibly, and in full compliance with the **UK Modern Slavery Act 2015** and **International Labour Organization (ILO) Core Conventions**. We have a zero-tolerance approach to all forms of modern slavery, human trafficking, forced labour, and exploitation within our operations and supply chains.

1. Purpose

This policy outlines Tritos Medical's commitment to preventing modern slavery and protecting human rights in all areas of our business and supply chain. It provides guidance to employees, suppliers, and partners on recognising, reporting, and preventing unethical practices.

2. Scope

This policy applies to:

- All employees, contractors, and temporary staff of Tritos Medical.
- All suppliers, subcontractors, and business partners engaged by or on behalf of the company.
- All geographic regions in which Tritos Medical operates.

3. Our Commitments

Tritos Medical will:

- Ensure all employment is freely chosen, with no use of forced, bonded, or involuntary labour.
- Prohibit child labour and ensure fair wages, working hours, and conditions for all staff.
- Conduct due diligence on suppliers to assess risk related to modern slavery and human rights violations.
- Include **Modern Slavery and Ethical Procurement clauses** in supplier contracts.
- Work only with suppliers that share our commitment to ethical business conduct and transparency.
- Provide ongoing training to employees involved in procurement, supply chain, and contract management.
- Encourage whistleblowing and provide confidential channels for reporting suspected abuses.

4. Supply Chain Due Diligence

We assess suppliers based on:

- Geographic and sector risk (e.g., manufacturing or hardware sourcing).
- Adherence to international human rights standards.
- Completion of supplier self-assessments and ethical compliance checks.
- Demonstrated compliance with the **Modern Slavery Act**, **ISO 9001**, and **ISO 14001** principles.

Suppliers found to be in breach will be subject to corrective action plans or contract termination.

5. Governance and Accountability

- The **Managing Director** holds overall responsibility for ensuring compliance with this policy.

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- The **Procurement and Compliance Team** are responsible for implementation, monitoring, and reporting.
- Regular reviews of suppliers and internal procedures are conducted to ensure continual improvement.

6. Training and Awareness

All staff receive training on ethical procurement, human rights, and modern slavery awareness as part of induction and refresher programmes. Procurement teams receive specific training on supplier vetting and risk identification.

7. Reporting Concerns

Employees and suppliers are encouraged to report any concerns relating to modern slavery or unethical practices via confidential internal reporting channels or directly to senior management. Reports will be investigated promptly and confidentially.

8. Review

This policy is reviewed **annually** by the Board of Directors to ensure ongoing compliance with legal requirements and best practice.

Approved by:

Ryan Colhoun, Managing Director

Date: 30/10/25

