

## CLINIMED (HOLDINGS) LIMITED

### GROUP STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015

#### INTRODUCTION BY THE BOARD OF DIRECTORS

The CliniMed Group will not tolerate any supplier, representative or business partner found to be involved in slavery, servitude and forced or compulsory labour, or human trafficking, and continues to strive for the highest ethical business practices throughout the Group and its supply chain. To this end, we shall continue to put into place practices and policies which support the aspirations and objectives of the Modern Slavery Act 2015. We are committed to improving our practices to combat slavery, human trafficking and child labour.

#### OUR STRUCTURE

**Clinimed (Holdings) Limited** is a privately owned company with headquarters in Marlow, Buckinghamshire, and it has seven wholly owned, UK based, subsidiaries:

**Clinimed Limited**, legal manufacturer and a distributor of medical devices in the fields of ostomy, wound and continence care, based in High Wycombe, Buckinghamshire;

**Securicare (Medical) Limited**, also based in High Wycombe, provides specialist nurses to the NHS, and holds a Dispensing Appliance Contractor's licence to dispense ostomy products on prescription. It has a team of specialist nurses and a patient services department to support its patients.

*SecuriCare has met the relevant threshold, and has published its own Modern Slavery Statement which can be found on its website;*

**Welland Medical Limited**, based in Crawley, West Sussex, designs and manufactures ostomy appliances which it supplies to the UK market through Clinimed Limited, and to the rest of the world through its distributor network.

*Welland has met the relevant threshold, and has published its own Modern Slavery Statement which can be found on its website;*

**Flexible Medical Packaging Limited**, which blends and packages various medical devices for a range of customers, including CliniMed Group companies, within its cleanrooms in Lancaster and Morecambe, Lancashire;

**Helapet Limited**, based in Houghton Regis, Bedfordshire, which distributes clean room consumables to aseptic units throughout the country, and undertakes the manufacture of wipes, cleaning solutions and filters in clean rooms at its facility;

**Careflex Limited**, which manufactures specialist seating at its base in Newton Abbot, Devon and supplies its products to NHS Trusts, Care Homes and private individuals through its own sales force, dealers and distributors;

**Hydrokem Aerosols Limited**, a specialist contract-packing aerosol company, manufacturing a range of medical, personal care, household and technical products;

**Clinimed (Holdings) Limited**, as the parent company, provides legal, financial, HR and overall direction to the Group from its offices in Marlow, Buckinghamshire.

## **OUR SUPPLY CHAINS**

We have considered our main sources of supply of goods and raw materials, recognising that a proportion of our business is intra Group. Our biggest customer in the UK is the National Health Service. However, our customer base also comprises wholesalers, distributors, private companies and individuals largely, but not exclusively, based in the UK and Europe. Many of our business partners, suppliers and customers around the Group are individuals or companies we have been working with over the long term: we know them well, and they know us as a Group with the highest ethical standards.

Our raw materials and distributed goods are mainly sourced from within the UK (including our own Group companies) or Europe, but we also have certain suppliers in other parts of the world and continue to add new suppliers.

Our key supplier agreements include an acknowledgement and acceptance of the principles set out in our Modern Slavery Statement, and these agreements remain under review as they continue to be rolled out to new and existing suppliers.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

We have continued to implement and improve systems which seek to:

- Fully understand our supply chains.
- Identify and assess potential risk areas in our supply chains, including having regard to the geographical location of suppliers and the monitoring of such locations against the Transparency International Corruption Perceptions Index (CPI).
- Regularly audit our suppliers. Where possible, this includes physical audits, which provide an opportunity to observe and converse with workers at supplier premises.
- Audit provides the opportunity to work with suppliers to mitigate the risk of slavery and human trafficking should they be found to be occurring in our supply chains. Audit and re-assessment of risk are carried out by various methods. For example, Flexible Medical Packaging carries out an annual risk assessment on all suppliers in accordance with their Quality Management System and, subject to the relevant risk assessment results, they may opt to conduct a



full audit. New suppliers are audited prior to acceptance. Clinimed Limited reassesses its Tier 1 (critical) suppliers against labour standards and modern slavery risks at least every three years (or sooner if issues are highlighted). It has ten Tier 1 suppliers, and no issues or concerns were raised in 2024. In accordance with our KPI 2023, we audited all new critical suppliers against labour standards and modern slavery risks prior to acceptance.

*KPI*

*We shall continue to reassess our existing high risk and critical suppliers at least every three years, in accordance with our quality systems.*

- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## **EMPLOYMENT PROCEDURES AND POLICIES**

- Recruitment policy. We operate a robust recruitment policy in accordance with relevant rules and regulation, including, but not limited to, conducting 'eligibility to work in the UK' checks for all potential staff to safeguard against human trafficking or individuals being forced to work against their will.
- Protection of Employees - by maintaining and communicating clear policies and procedures, for example, effective grievance and dignity at work policies, all staff know that they can raise concerns about how they and their colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our policies are designed and strictly adhered to as reassurance to our workers that our Group treats them fairly, equally and transparently and comply with all relevant legislation and best practice.
- We only employ agency workers through reputable employment agencies. We only utilise agencies which are governed by the Employment Agencies Standard Inspectorate or the Recruitment and Employment Federation to ensure the highest standards of professionalism and adherence to employment law and international standards.

As much of the work we do involves the NHS, we are also required to adhere to its high standards of ethical requirements and its policies on such matters, and our own policies are largely shaped by the requirements placed by the NHS on its suppliers of goods and services.

All but two of our businesses are Gold accredited to Investors in People (IiP); neither Hydrokem Aerosols nor Flexible Medical Packaging is evaluated or accredited through IiP. Of the seven Great Place to Work surveys, five legal entity employers achieved the threshold of greater than 65% Trust Index, the majority of our operating businesses were certified Great Place to Work, and two narrowly missed this accreditation (Welland Medical and Hydrokem Aerosols, by 1% and 2% respectively).

The well-being of our staff is of course an important focus for us. Each of the businesses has access to at least one trained Mental Health First Aider, who is known, and available, to all staff. Our Line Managers receive mental health awareness training. In addition, our employees have unlimited access to Help@Hand a health and wellbeing APP; services include mental health consultations, 24/7 remote GP appointments, physio, a 24/7 helpline, 1-2-1 lifestyle coaching and savings and discounts. Help@Hand is for both our employees, as well as their family members, and is knowingly available and a well-used toolkit. We also extend the Simply Health benefit to our operating businesses; this is a healthcare plan supplemented with unlimited access to a health and wellbeing APP, and other services including mental health consultations, 24/7 remote GP appointments, physio and a 24/7 helpline.

We conduct staff surveys at least annually at each of our businesses: we feed back results and engage with staff to ensure that they can see that we use the findings to make improvements where requirements have been identified. On the eNPS five businesses saw significant improvements (fifteen or more points). Our recent Great Places to Work surveys evidence that our employee/employer engagement efforts are directionally on track in accordance with our KPI 2023 in relation to continuous improvement and endorse our initiative to work more closely towards the Trust Index; when employees trust their leaders and feel engaged, they are more motivated, focused, and productive.

## **POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. This statement is supported and reinforced by our Policies and Procedures.

## **SUPPLIER ADHERENCE TO OUR VALUES**

To ensure all those in our supply chain, and contractors, comply with our values we shall continue to expand our existing work to improve our supply chain compliance programme, involving the due diligence steps outlined above, by approaching a wider range of suppliers to ask them about their own work in this area, and the dissemination of this statement to them. Appropriate questions and sections concerning ethical practices are included in our supplier evaluation questionnaires, SOPs, policies and risk assessments (RA). The responses and RA are regularly reviewed and remain key focus areas for our supply chain leads across the Group.

We recognise that the discrete companies within our Group are at differing stages in the processes described, and our overall aim is to achieve a robust, risk-based, consistent and appropriate approach to compliance and continuous improvement in this area.

Having previously achieved accreditation to the NHS Labour Standards Assurance Scheme, Clinimed Limited carries out an annual internal audit to ensure continued



adherence to this standard. Clinimed Limited also completes the NHS Modern Slavery Assessment and monitors its compliance with relevant labour standards criteria; risk assessments are carried out as necessary. This activity is conducted quarterly by meetings of its Labour Standards and Modern Slavery Group (comprised of Legal, Compliance, HR and Technology leads). These meetings review, examine and agree on improvements to the processes and procedures we have implemented such as checks and audits on our own suppliers, and apply similar standards around the wider Group.

Hydrokem Aerosols Limited remains a member of SEDEX and as such is audited annually. SEDEX is one of the world's leading ethical trade service providers, which operates to improve working conditions in global supply chains. The audit provides a robust monitoring matrix and ensures insight into continuous improvement opportunities, and all relevant conformances are addressed.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we shall make our staff aware of the issue of modern slavery and the company's attitude to it, whilst continuing to foster an environment in which all our staff feel empowered to, and secure in, raising any concerns they may have.

During 2023, we rolled out online Modern Slavery Awareness training to discrete employee cohorts around the Group, and through 2024 we expanded this selection to a broader category of personnel. This training is now included in our induction programme, and for existing staff it is refreshed on a regular basis.

Our Group's senior procurement professionals are members of CIPS (Chartered Institute of Purchasing and Supply) which, as an organisation, has a wealth of guidance and online training available. CIPS members undertake mandatory ethics training annually, which sets a global standard for best practice.

## FURTHER STEPS

We shall continue to review compliance throughout the coming year, and future statements will demonstrate the development and attainment of the goals expressed herein.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2024.

It has been approved by the Board of Directors of Clinimed (Holdings) Limited.



Nigel D Piercey  
Group Chairman,

Clinimed Group of Companies.

Date: 24<sup>th</sup> June 2025.