

Modern Slavery Act Statement 2024

Halma plc



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Introduction



A message from our CEO



***"WE OPERATE ETHICALLY,
TRANSPARENTLY AND WITH
INTEGRITY IN ALL THAT WE DO"***

As the Group Chief Executive, I lead this important agenda for Halma and our Group and will report annually on the steps that we have taken and will be taking to prevent modern slavery.

A copy of this Statement is available on the Company's website at www.halma.com and also at the Modern Slavery Statement Registry.

This statement was approved by the Board of Halma and signed on its behalf by:

Marc Ronchetti
Group Chief Executive

6 June 2024

Halma Modern Slavery Compliance Statement

Halma plc (Halma) supports the provisions set out in the Modern Slavery Act 2015 (the "Act") and has taken steps to prevent modern slavery occurring in its supply chain and within its own operations. This statement has been published in accordance with Section 54 of the Act and applies to Halma and its subsidiaries (the "Group") in respect of the financial year ended 31 March 2024. The individual companies which currently meet the requirement to report under the Act and those companies that do not currently meet the requirement to report under the Act, but have in prior years, have been specifically mentioned in this Statement and cover approximately 50% of total sales revenue.

www.halma.com

<https://www.halma.com/investors/annual-report>

About Halma: Business Structure



Halma is a global group of life-saving technology companies. Our companies provide innovative solutions to many of the key problems facing the world today. Halma employs over 8,000 people in over 45 businesses operating in more than 25 countries. We have a lean and highly decentralised structure and each business is a separate legal entity and has its own board of directors with accountability for implementing controls set by Halma's group legal and compliance framework.

Our purpose - to grow a safer, cleaner, healthier future for everyone, every day - drives our strategy and culture. Our companies and products have a core focus on safety, health and environmental markets.

Our businesses are grouped within three sectors:

Safety: Technologies that save lives, protect infrastructure and enable safe movement, and also technologies that protect people and assets at work across a range of critical industrial and logistics operations.

Environmental & Analysis: Technologies that monitor and protect the environment and ensure the quality and availability of life-critical resources.

Healthcare: Technologies that enhance the quality of life for patients and improve the quality of care delivered by healthcare providers.

More information about our sectors is available on www.halma.com.



Halma locations and supply chains



Our companies operate in predominately low risk countries (as defined by the Walk Free Modern Global Slavery Index 2023). More information about our companies and what they do, as well as their locations and corporate offices can be found on our website, www.halma.com.

As a decentralised business, each company is responsible for managing its supply chain and consequently its supplier due diligence; further information on our companies due diligence activities can be found on pages 14–26.

Companies can also request support and guidance in respect of their supply chains from the Group, for example by choosing to utilise the licence to the EcoVadis system which the Group makes available to its companies, and taking advantage of the Group's offer of supplier risk screening during 2024, as detailed in our Risk Assessment section.

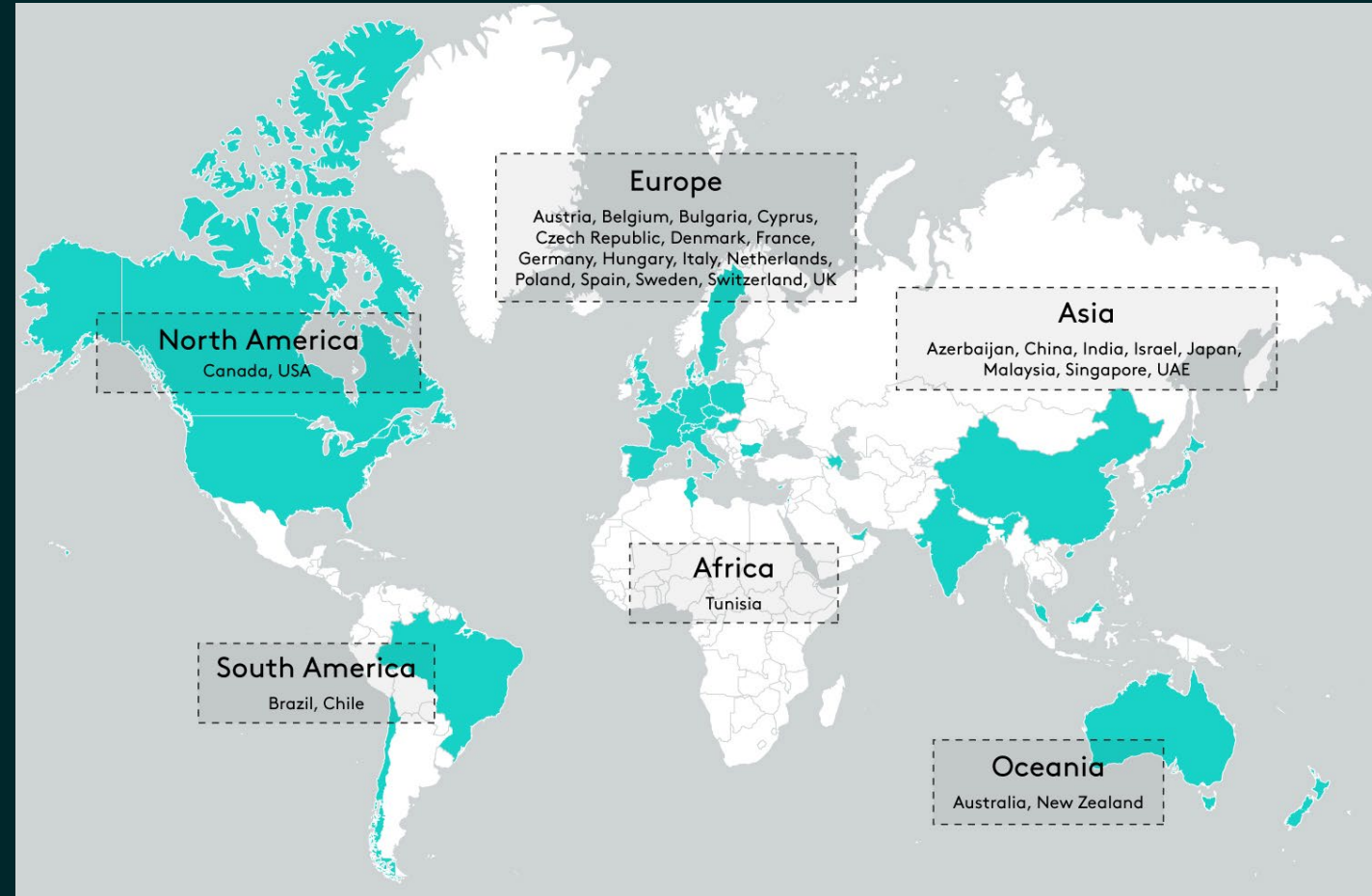


Figure 1: Distribution of Halma's production and office facilities as at 31 March 2024

Group-level control framework



Group-level control framework overview



Halma is the parent company of the Group and the Group Executive Board sets the framework under which our businesses operate. This is detailed in the next sections. We have an autonomous organisational structure with each Halma company operating as a separate legal entity with its own board of directors with clear lines of accountability. As the directors and officers of their companies, local management are empowered to lead their business and are responsible for their own supply chains.

The Group Chief Executive, Marc Ronchetti, leads the modern slavery agenda for Halma and has ultimate responsibility for modern slavery policies but is supported by various functions including Compliance and Sustainability. Local management are tasked with implementing relevant modern slavery policies and any suspected violations are investigated in line with our Investigation Policy and an adequate response is implemented by the relevant company with support from Halma plc.

During the process described in this document, we haven't identified any indicator of modern slavery nor any suspected or actual cases of modern slavery during the year ended 31 March 2024.

Risk Assessment



Supply chains

Halma and its companies have a large global network of suppliers, and supply chain risk is assessed at both the Group and company level. Halma has previously carried out a detailed risk assessment with STOP THE TRAFFIK to identify modern slavery risks across our entire supplier network. Following the risk assessment, Halma continued to support its companies in mitigating risks and embedding key policies, covering all aspects of modern slavery.

During 2024, Halma conducted a further modern slavery supplier risk assessment using the LRQA EiQ platform. The largest suppliers of the Halma companies falling within scope of producing a Modern Slavery Statement were screened to assess the level of modern slavery risk. The exercise covered a supplier annual spend of approximately £335 million and spanned suppliers across US, Europe, Asia and Australasia, with c.64% of the supplier base being spread across the UK and US. The results of the assessment have been shared with our companies so that these can be further evaluated to assess the need for any further risk mitigating actions.

Halma has continued to encourage companies to utilise the Group license to the supplier sustainability platform EcoVadis which reviews and rates suppliers on four key themes, including labour and human rights.

Own operations

Whilst acknowledging that Halma predominantly operates in countries deemed to be low risk in respect of vulnerability and/or prevalence of modern slavery (as ranked by the Walk Free Global Index), Halma conducted a risk assessment during the year to identify potential risks, in relation to modern slavery within the workforce, and the practices and processes in place to mitigate these risks, for those companies operating in countries considered to be medium to high risk for modern slavery. The locations included Dubai, Poland, Cyprus, Brazil and Tunisia. The assessment found that those companies have strong controls in place to prevent modern slavery in their own operations. In addition, only a minority of the companies identified used contracted labour, and where contracted labour was used, this was kept to a minimum and only reputable employment firms with policies aligned to Halma's principle were used.

Policies and Procedures



Halma has a culture of openness, integrity and accountability. We require our employees to act fairly in their dealings with fellow employees, customers, suppliers and business partners. We are committed to preventing modern slavery and human trafficking in our operations and in our supply chains. The Group has a range of policies and procedures which mitigate the risk of modern slavery.

Code of Conduct

Our worldwide Code of Conduct (Code) sets out the ethical standards that govern the activities of the Group, our employees, and business partners. The Code includes a specific provision concerning the prevention of modern slavery and human trafficking, setting out:

- Our clear commitment to never tolerate, or engage with those who enable modern slavery, human trafficking, and other abuses of labour right; and
- An explanation of how modern slavery prevention falls within the remit of our Human Rights and Labour Conditions Policy.

The Code is available on our [website](#). It is a Group-wide requirement that all our new employees receive, and sign to acknowledge that they have read the Code. A refreshed Code of Conduct was rolled out in FY24.

Modern Slavery Act Policy

Halma has a Modern Slavery Act policy in place which applies to all businesses within the Group. This policy is important as it encourages a consistent approach to modern slavery prevention across our de-centralised company structure. The policy outlines:

- What modern slavery is, which industries are at heightened vulnerability, which countries and sectors are known to be high-risk, and which indicators should raise concerns;
- The requirements of the Act; and
- Recommendations for best practice mitigation and methods for determining their operations and supply chain modern slavery risk.

All businesses are required to review and consider the areas set out within the policy.

Policies and Procedures



Human Rights and Labour Conditions Policy

Modern slavery prevention falls within Halma's human rights approach to sustainability. Halma's Human Rights and Labour Conditions policy endorses the dignity and rights of all individuals as established in the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The policy commits Halma to integrate compliance with human rights throughout the Group's activities, ensuring that human rights are respected at all times and are protected within Halma's sphere of our influence. The Policy includes several commitments which are key for modern slavery prevention:

- To never tolerate forced or bonded labour, and to never require employees to leave deposits or identity documents with their employer;
- To never tolerate child labour and to require all employees to be above the minimum legal working age;
- To respect any employee's right to form or join a trade union, and to never discriminate against members of trade unions; and
- To ensure that employees always have the freedom to leave their employer.

Our Human Rights and Labour Conditions Policy can be found [here](#).

Whistleblowing Policy

The Group has a whistleblowing policy and an established third-party whistleblowing service, accessible both online and by telephone, which allows employees in any of our businesses to raise concerns in confidence, anonymously (where permitted by law) and independent of their company. Our third-party whistleblowing facility is not limited to employees and can be used by anyone, including our customers and suppliers.

In order to ensure that the mechanism remains accessible and trusted by our employees, the whistleblowing policy explains how the process works, how anonymity will be preserved, and an assurance that a whistleblower will not be treated negatively for raising an issue in good faith.

Halma's Board (and Audit Committee, where concerns relate to potential financial misconduct or fraud) reviews the nature of reports made through the whistleblowing channel in order to ensure that it remains an effective mechanism for raising concerns, that such reports are properly investigated under the direction of the Director of Risk and Compliance, in line with Halma Investigation Policy, and that there are no recurring trends that would suggest underlying cultural or ethical issues in the Group. No suspected or confirmed cases of modern slavery have been reported to date.

Our Whistleblowing Policy and contact details can be found [here](#).

Training



Halma runs online modern slavery training in partnership with VinciWorks. This currently includes two main courses: (i) Modern Slavery Act: Preventing Exploitation ("Preventing Exploitation Training"); and (ii) Modern Slavery Act: Practical Steps for Procurement ("Procurement Training") (together the "Modern Slavery Training Courses"). To date, over 5,350 Modern Slavery Training Courses have been completed by Halma Employees. Senior management, subsidiary board directors and other key business personnel are automatically enrolled on the Modern Slavery Training Courses.

The Modern Slavery Training Courses cover a variety of topics including: (i) what modern slavery is, and which groups are at heightened vulnerability; (ii) how modern slavery affects UK companies and the legal implications; (iii) how to identify high-risk suppliers and operations; (iv) how to identify cases of modern slavery and report concerns; (v) which countries and products have higher risks of slavery and exploitation; and (vi) what questions to ask suppliers in order to uncover instances of slavery.

Other Group-level controls

Internal control certifications

All businesses are required to complete a semi-annual internal control certificate which confirms that they have complied with key areas of control and compliance mandated by Group's policies and procedures (see Policies and Procedure section for more information). This certificate includes a specific provision confirming that all employees have read and signed our Code of Conduct which communicates our approach to critical human rights, business conduct and ethical matters, including modern slavery.

Halma standard Terms and Conditions

Our UK businesses are asked to incorporate specific clauses on compliance with anti-slavery laws in their standard sale and distribution terms and conditions. These terms also require that distributors do not engage in any modern slavery practice.

During the year Halma has standardised terms and conditions for the recruitment of employees and contractors, the terms of which include compliance with anti-slavery laws. These will be implemented in the year ahead to UK based contractors.



Company- level control framework



Company-level control framework



Companies are required to implement and comply with the Group-level control framework. We have in place a detailed guidance note to raise awareness of the Modern Slavery Act and the issue of modern slavery in the business and supply chain which is available to all our companies. Each company is responsible for their own supply and operation chains and is required to consider the potential issue of modern slavery and human trafficking within their business and supply chain and implement the relevant anti-slavery policies.

Whilst companies take varying approaches to assessing and mitigating risk in their supply and operation chains, in line with our decentralised operating model, the statements provided by our companies within the appendix demonstrate that each of these companies conducts initial and ongoing risk assessments and has due diligence processes in place. These activities may include, but are not limited to, issuing supplier questionnaires, incorporating specific clauses within their supplier and employment terms and conditions, producing supplier codes of conduct, conducting regular site visits and audits, salary benchmarking and, where temporary labour is used, using reputable employment firms and conducting appropriate due diligence checks.

As detailed in the Risk Assessment section, each company required to produce a Modern Slavery Statement took part in a modern slavery risk assessment screening exercise during the year, to assess modern slavery risks. The results of the assessment have been shared with our companies so that these can be further evaluated to assess the need for any further risk mitigating actions.

Further information on modern slavery risk assessment, due diligence and mitigation can be found in the individual company statements, within the appendix.

Appendix

Individual company statements on modern slavery for the year ended 31 March 2024

Accutome Inc (Accutome) *Designs, manufactures and distributes equipment and solutions for the eye care industry.*

Accutome is committed to ethical and sustainable business practices, including adherence to the Modern Slavery Act 2015.

As part of Accutome's supplier selection process, Accutome validates that all new suppliers adhere to the Modern Slavery Act, while its ongoing supplier evaluation program includes an assessment of a suppliers' ethical business practices, health and safety governance, welfare facilities and employee training and development opportunities.

The Accutome board and relevant employees all undertake Halma's Modern Slavery Act compliance training.



Advanced Electronics Limited (Advanced) *Designs and manufactures specialist fire safety systems.*

Advanced is committed to protecting human rights and preventing modern slavery. All new supplier relationships are considered carefully prior to committing to working together; procedures include supplier questionnaires and audits. Further, we also perform regular procedures on our existing suppliers to ensure they are acting in the right way, this includes at least biennially audits, depending on the nature of the supplier, and quarterly reviews. We continue to challenge ourselves on how we can strengthen our controls and processes through regular review of policies, agreements, audit procedures and evaluations.



Alicat Scientific Inc (Alicat) *Designs and manufactures flow and pressure devices which are used in medical and scientific instrumentation and industrial applications.*

Alicat Scientific is committed to respecting human rights and preventing modern slavery. All executives and key personnel have undertaken Halma's Modern Slavery Act compliance training. New employees sign the Halma Code of Conduct, confirming their understanding and commitment to the policy. The supply chain has been reviewed to identify potential risk areas keeping in mind what locations are in high-risk countries as identified by the Global Slavery Index.



Apollo America Inc (Apollo US) *Designs and manufactures fire detection solutions for commercial and industrial applications.*

AAI is committed to taking the right actions regarding modern slavery within our organization, with our suppliers, and with our customers. The following items are in addition to the Halma policies, code of conduct, VinciWorks training, and required internal control certificates.

Currently and within the last fiscal year, AAI has identified no modern slavery items of concern either inside or adjacent to our business.

Internal Operations

Our operation consists of ~140 people in the United States of America, and 4 people in India. Both sites are Halma sites that follow all guidelines and processes. Our temporary labor is limited to the USA site and through a reputable organization well known within the Automotive industry that is prevalent in our area. That temporary labor generally makes up about 1-3% of our workforce. The employer pays principal is not explicitly incorporated into our hiring process, but we do proper wage validation checks for new hires and current staff at a minimum annually to ensure fair pay based on role, responsibility, and location.

Supply Chain

Our supply chain mapping and risk assessment has begun with Halma support by submitting our top 25 suppliers for ESG screening. Site visits to most of our key suppliers happen regularly as part of normal business, and AAI requires all suppliers to adhere to our AAI supplier code of conduct which specifically references labor conditions and human rights. AAI selects new suppliers based on a comprehensive review process that incorporates an audit into this area of concern as well. Additionally, we do not procure from any grey market suppliers, and always perform an audit if pricing is lower than market averages.

Next Steps

AAI Will focus this FY on documenting some of the informal processes that are active today and implement a regular cadence of a risk assessment for current suppliers and customers.



Apollo Fire Detectors Limited (Apollo UK) Designs and manufactures fire detection solutions for commercial and industrial applications

Apollo's commitment to respecting human rights and preventing modern slavery is outlined in its supplier handbook which is sent to all suppliers. This handbook clearly states that all Apollo suppliers are required to comply with modern slavery laws and respect human rights, and that failure to do so could void supplier agreements.

All suppliers are assessed annually for a variety of risk variables, including modern slavery prevention. Risk factors such as suppliers' country of operations, membership to the Responsible Business Alliance, and company Modern Slavery Statements are all assessed. When a supplier is perceived to be high-risk for modern slavery, full on-site audits are carried out. In addition, the Apollo board and relevant employees have undertaken Halma's Modern Slavery Act compliance training.



Avo Photonics

Avo Photonics, Inc (Avo Photonics) Designs, develops and manufactures private label photonics

Avo Photonics does not tolerate the use of child labour, forced labour, or human trafficking in any form—including slave labour, prison labour, indentured servitude, or bonded labour—in our operations or value chain.

Prior to partnering with a supplier, Avo Photonics evaluates the risk of modern slavery based upon the supplier's location, the type of commodity being purchased, and the supplier's commitment to prevention of modern slavery. Avo Photonics current supplier database does not include any that reside in high-risk countries as identified by the Global Slavery Index. Avo Photonics' purchasing terms and conditions require that suppliers comply with all laws concerning slavery and human trafficking.



Bureau d'Electronique Appliquée S.A. (BEA) *Designs and manufactures motion, presence and safety sensors.*

All of BEA's suppliers are audited before starting any new business. A specific question on compliance with the Modern Slavery Act is a key trigger before new business can commence with BEA.

BEA purchasing terms and conditions include a specific requirement on all suppliers to adhere to the UK Modern Slavery Act. These purchasing terms and conditions can be viewed on the BEA website and are available in English, French and Chinese and a link to this web page is printed on every single purchase order.

For incumbent suppliers, BEA Quality and Purchasing teams visit suppliers regularly. During these visits, working conditions, working environment, worker safety and labour conditions are reviewed.

In 2024, BEA introduces the Supplier Code of Conduct in which a specific section further explain all the aspects needed for compliance (avoidance of forced labour, avoidance of child labour, non-discrimination, fair treatment, freedom of association and right to collective bargaining, working hours, wages and other benefits).

This Supplier Code of Conduct is part of a Compliance package (including REACH, ROHS, Conflict minerals) which is sent to suppliers and for which we will track return and feedback.



CenTrak, Inc. (CenTrak) *Designs and manufactures real-time location services for healthcare facilities.*

CenTrak prioritises quality and ethical sourcing. To ensure this, CenTrak requires documentation from suppliers attesting to their compliance with the 2015 Modern Slavery Act. This documentation includes a questionnaire about modern slavery and human trafficking which CenTrak asks its new suppliers to complete. This helps CenTrak understand each supplier's operations and supply chain risk. The questionnaire includes questions about the following:

- the supplier's policies and procedures to mitigate modern slavery risk;
- how do they manage their own supply chain risk; and
- the awareness training they have conducted.

Additionally, all relevant CenTrak employees have completed Halma's Modern Slavery Act compliance training.



Crowcon Detection Instruments Limited (Crowcon) *Designs and manufactures gas detection instruments.*

Crowcon conducts a preliminary modern slavery risk assessment on all its new suppliers. This risk assessment is based upon geography, the commodity being purchased and the nature of the transaction.

Crowcon performs onsite quality assessments, or where geographical restrictions apply, a quality audit questionnaire is completed by all Class A suppliers which includes the Modern Slavery section and code of conduct. As part of Crowcon's commitment to its sustainability KSO's, the top 10 suppliers by spend will also be asked to complete the Ecovadis sustainability audit which includes Modern Slavery.

Crowcon refreshes the quality audits and agreements with its suppliers on an on-going basis. The Crowcon board and relevant employees have undertaken Halma's Modern Slavery Act compliance training.

We have not identified any violations during the year.

Fortress Interlocks Limited (Fortress) Fortress designs and manufactures safety equipment, protecting lives in hazardous workplaces.

Fortress is committed to eliminating the risk of modern slavery occurring within its own business, infiltrating its supply chains or through any other business relationship.

The policy applies to all persons working for or on behalf of Fortress, in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third-party representative.

Fortress expects all who have, or seek to have, a business relationship with the Company to familiarise themselves with this policy and to act in a way that is consistent with its values. To be clear, Fortress will only do business with organisations who fully comply with this policy.

Other forms of modern slavery, which will not be tolerated but are not specifically referenced in the MSA, include, but are not limited to:

- **Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development; and**
- **All forms of modern slavery which involve, the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.**

Tackling modern slavery requires colleagues to play a part and remain vigilant to the risk in all aspect of the Fortress business and business relationships.

Fortress carries out 'on-boarding' audits and regular self-assessments on all suppliers. As part of this process, Fortress assesses its suppliers on a variety of risk factors including location of operations, sub-supply assessment, supplier policy and document control assessments.



HWM-Water Ltd (HWM) Designs and manufactures monitoring and telemetry equipment for water, wastewater and gas networks.

HWM-Water supports the provisions set out in the Modern Slavery Act ("the Act") and, through our own Human Rights and Labour Conditions Policy, endorses the core requirements of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, including the conventions relating to forced labour, child labour, non-discrimination, freedom of association and right to collective bargaining. We do not tolerate practices which contravene these international standards. Regulatory demands upon us vary considerably around the world, so HWM-Water establishes the core structure to ensure that it fully complies with legislative and regulatory requirements.

The Act requires organisations to publish a slavery and human trafficking statement on an annual basis where they have a turnover of over €36 million, carry on business in the UK and are supplying goods or services. This statement sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our business nor our supply chains.

HWM-Water has a culture of openness, integrity and accountability. We require our employees to act fairly in their dealings with fellow employees, customers, suppliers and business partners.

We do not believe that we operate in any high-risk industries and, based on the Global Slavery Index 2016, we do not have business operations in the highest risk countries.

Our worldwide Code of Conduct sets out the ethical standards that should govern the activities of HWM-Water and its subsidiaries, and the activities of our employees and business partners. Our policies and procedures specifically reference modern slavery and human trafficking. The Halma Code of Conduct requires that all HWM senior management, externally facing personnel and those involved in supply chain have undertaken Halma's Modern Slavery Act compliance training and are fully aware of the risks, indicators, and signs of Modern Slavery. New employees sign the Halma Code of Conduct, confirming their understanding and commitment to the policy. We are refreshing our internal training schedule in the coming year to expand our internal education on risk awareness and identification of non-compliance.

continues.....



HWM-Water Ltd (HWM) Designs and manufactures monitoring and telemetry equipment for water, wastewater and gas networks continued.

The use of temporary and agency workers is limited and is less than 10% of the total workforce in the UK headquarters, however we contract through a large and reputable employment agency that fully recognises and adheres to the provisions of the Act and ensures compliance with its strict policies and training program through the ISO accreditation.

The Group has a clear whistleblowing policy and an established third-party whistleblowing hotline which allows employees in any of our businesses to raise concerns confidentially, anonymously (where permitted by law) and independent of their company.

We regularly undertake audits of our major suppliers. Prior to engaging with major suppliers, due diligence and vetting procedures are in place to ensure that suppliers will meet our required standards. Our Supplier Approval process requires new suppliers to complete a questionnaire supporting their adherence to the Modern Slavery Act and are challenged on their answers. Existing tier 1 suppliers are required to confirm ongoing monitoring and adherence to the Act. The process also assesses whether further investigation is required such as a site visit and audit prior to approval.

HWM is an Ecovadis Silver certified company; this accreditation encompasses the Modern Slavery act as part of the overriding ESG agenda.



Keeler Limited (Keeler) *Designs, manufactures and distributes equipment and solutions for the eye care industry.*

Keeler is committed to ethical and sustainable business practices, including adherence to the Modern Slavery Act 2015.

As part of Keeler's supplier selection process, Keeler validates that all new suppliers adhere to the Modern Slavery Act, while its ongoing supplier evaluation program includes an assessment of a suppliers' ethical business practices, health and safety governance, welfare facilities and employee training and development opportunities.

The Keeler board and relevant employees all undertake Halma's Modern Slavery Act compliance training.

SUNTECH

SunTech Medical Inc (SunTech) *Designs and produces blood pressure technologies and solutions.*

SunTech Medical incorporates provisions into Terms and Conditions for all purchase orders requiring suppliers to be in compliance with the UK Modern Slavery Act 2015. All SunTech Board members and supply chain employees have undertaken the Halma-sponsored Modern Slavery Act training. All supplier audits will include a risk assessment of modern slavery.



Microsurgical Technology, Inc (MST) *Designs and manufactures surgical devices and instruments used to improve sight.*

MST is committed to respecting human right, preventing modern slavery, and communicating vendors through provisions included on our Terms and Conditions available on Company's web site. New employees sign the Halma Code of Conduct, confirming their understanding and commitment to the policy. Out of Top 20 suppliers, we have one from India and we have done in-country monitoring in-person audit

Medicel AG (Medicel) Designs and manufactures specialist eye surgery instruments.

As part of our commitment to combatting modern slavery, Medicel has taken several steps to ensure compliance with the Modern Slavery Act and integrate responsible practices throughout our supply chain.

Medicel's supplier quality agreement mandates compliance with the Modern Slavery Act. This is further reinforced by the use of a Supplier Labour Standard Assurance Questionnaire, which demands due diligence information from our suppliers. This includes the number of migrant workers employed, the presence of a workers' representative, and a summary of actions taken to mitigate risks. These actions encompass the implementation of labour standards policies and informing staff of their rights.

In the ongoing year, Medicel has strengthened its stance against modern slavery by incorporating a compliance clause in all new and existing supplier and customer agreements. A pivotal part of our strategy involves auditing every new or current supplier situated in countries with a high risk of modern slavery prevalence. Our business relationships are regularly reviewed for modern slavery risks, and we employ standard terms and conditions related to modern slavery in all supplier contracts. We conduct audits of our operations and suppliers to prevent modern slavery, leveraging resources, tools, and expert advice. This ensures that our supply chain remains transparent and ethical.

The management and oversight of these initiatives are taken seriously, with the Medicel board and relevant employees undergoing Halma's Modern Slavery Act compliance training. This training is a testament to our dedication to leadership and accountability in this critical area.