

## 1. Our Policy

Surgical Holdings is opposed to slavery and human trafficking in any part of our activities or our supply chains. We are therefore committed to ensuring that we have adequate policies and procedures in place to identify and prevent these practices.

We met the turnover threshold applicable under section 54 of the Modern Slavery Act 2015 in the period covered by this statement.

## 2. Our Business

Surgical Holdings manufactures and distributes a broad range of surgical instruments and skeletal pins and wires to the NHS and Private Healthcare companies across the UK, Ireland, Europe and other international regions. Seasonal work is not a feature of the industry in which we operate.

More information on our business is available on our website.

## 3. Supply Chains

Our primary supply chain partners are authorised medical device manufacturers, distributors and raw material suppliers. The large majority of these are located in countries where the risk of modern slavery and human trafficking is Low. Where we deal with suppliers in countries where this risk is higher, more robust controls and due diligence have been put in place to avoid these affecting our activities or our supply chains.

Steps taken include:

- Quality and ethical due diligence checks/reports:
  - Risk based approach to desktop and site auditing including third party auditors or compliance schemes.
  - Robust agreements including quality and supply chain integrity clauses where applicable.
  - Signed statements of compliance and/or acceptance to our Code of Conduct.
- Open regular two-way communications on compliance expectations and performance:
  - Provision of training and awareness materials to our partners where required.
  - Agreeing mitigating controls and corrective actions where require.
  - Terminating the relationship if mitigation not possible.

## 4. Our Policies on Slavery and Human Trafficking

The Surgical Holdings Code of Conduct sets out our Organisation's commitment to acting ethically and with integrity towards our employees and in all our business relationships. Specifically, this Code sets out our commitment to fair employment practices and our commitment to preventing, as far as practicable, slavery and human trafficking in our supply chains.

The Surgical Holdings Code of Conduct sets out the approach taken to ensuring that all the products we sell meet applicable legal and ethical standards, including human rights and minimum labour standards.

In addition, the Corporate & Social Responsibility Policy coupled to our H&S Policy sets out our specific commitment to operate to internationally recognised standards of human rights, including in relation to forced labour, child labour and unsafe working conditions.

These documents outline the detailed requirements we follow at Surgical Holdings, and which have been integrated into procedures. These commitments are audited by an independent third-party Organisation annually. In addition, we participate in the NHS Labour Standards Assurance System including annual third-party audits of our Supply Chain Integrity Procedures. We also participate in customer evaluations of our compliance to labours standard and modern slavery requirements.

**Training and awareness:** We provide relevant staff with training and guidance on modern slavery and human trafficking risks, including awareness of indicators, reporting mechanisms, and due diligence requirements. This training is refreshed periodically and is designed to ensure employees understand their responsibilities in identifying and escalating potential risks.

## 5. Due Diligence and Assessing and Managing Risk


As part of our compliance with the policies and procedures referred to above, we take the following steps:

1. Assess potential risk areas in our supply chains, including where partners or potential partners are located in countries where slavery or human trafficking are a risk. The risk assessment considers the industry or geographies in which they operate. Geographic risk, for this purpose, is informed by relevant independent indices such as the Corruption Perceptions Index or Global Slavery Index.
2. Carry out enhanced due diligence on certain partners following this risk assessment.
3. Mitigate the risk of slavery and human trafficking occurring in our supply chains, including by reviewing, where necessary, the controls that our partners have in place, asking partners to confirm that they meet certain standards and carrying out other suitable checks including audits.
4. Monitor potential risk areas in our supply chains on a periodic basis.

## 6. Assurance and Key Performance Indicators

Responsibility for ensuring that our policies and procedures are adequate and are adhered to in all areas of our activities rests with the senior management team of Surgical Holdings. Regular updates are provided to the Surgical Holdings Leadership Team for review and feedback.

Our policies and procedures are audited periodically by internal auditors and by third parties to assure compliance and to identify areas for improvement. These audits address supply chain integrity risks including the abuse of human rights and employment rights.

Signed:  [Daniel Coole \(May 12, 2026 13:41:28 GMT+1\)](#)  
DANIEL COOLE (Managing Director)

Date: 12/05/2026

# Modern Slavery Policy (iss 2, May 2026)

Final Audit Report

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