

**Document Number:** DOC-0330326

**File name:** Modern Slavery Prevention Statement and Policy

**Revision status:** Rev. 2 **Issue Date:** 05/01/2026



## Modern Slavery Statement

### Introduction

Surgimax Instruments Ltd is a UK based manufacturer and distributor of non-sterile reusable surgical instruments supplying to the hospital, medical professionals and distributors worldwide while managing approximately 15,000 product lines.

Surgimax is committed to preventing modern slavery and human trafficking in our business operations and supply chains. This statement outlines the steps we have taken to ensure that slavery and human trafficking do not occur in our operations or those of our supply chain partners, in compliance with the Modern Slavery Act 2015 and Public Procurement Note (PPN) 02/23.

### Organization Structure and Supply Chains

Surgimax is a global provider of high quality surgical instruments, headquartered in the UK. Our supply chain spans raw material suppliers, manufacturing partners, and distributors across Europe, Asia, and the Americas. We work collaboratively with suppliers to ensure ethical practices and compliance with international labor standards. Policies to Combat Modern Slavery We maintain a zero-tolerance approach to modern slavery, supported by the following policies: -

- **Ethical Sourcing Policy:** Ensures all suppliers adhere to labour laws and ethical standards.
- **Code of Conduct:** Prohibits forced labour, human trafficking, and discrimination.
- **Labour Standards Assurance Policy (LSAS):** Reinforces our commitment to fair wages, safe working conditions, and the prevention of exploitation.

### Due Diligence Processes

Our due diligence measures to prevent modern slavery include: -

- Conducting supplier audits and ethical risk assessments.
- Requiring all suppliers to sign our Supplier Code of Conduct, affirming compliance with our labour standards.
- Monitoring high-risk suppliers through regular inspections, reporting, and corrective action plans.

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### Risk Assessment and Mitigation

We evaluate modern slavery risks through: -

- Annual risk assessments of supply chain practices, focusing on high-risk regions.
- Monitoring raw material sourcing to identify and address vulnerabilities.
- Engaging with suppliers to improve labour practices and address identified risks.

### Measuring Effectiveness

We measure the effectiveness of our efforts through: -

- Tracking the number and outcomes of supplier audits annually.
- Monitoring the percentage of suppliers meeting ethical labour standards.
- Recording and addressing incidents of non-compliance.

### Training and Awareness

To ensure awareness and compliance: -

- All employees receive training on identifying and mitigating modern slavery risks.
- Procurement and supplier management teams receive specialized training on ethical supply chain practices.

### Commitment to Improvement

We are committed to continuously improving our policies and processes to combat modern slavery. This statement will be reviewed annually to reflect emerging risks and align with industry best practices.

Reviewed By			
Name (Position)	Naveed Alam (General Manager)	Date:	19/12/2025
Signed	<i>Naveed Alam</i>		

Approved By			
Name (Position)	Shahbaz Ahmed (Managing Director)	Date:	28/12/2025
Signed	<i>Shahbaz Ahmed</i>		

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## Modern Slavery Prevention Policy

### Introduction

Surgimax Instruments Ltd is committed to preventing modern slavery and human trafficking in our operations and supply chains. This policy outlines the principles, governance, and measures we have established to ensure compliance with the Modern Slavery Act 2015 and related best practices, including Public Procurement Note (PPN) 02/23.

### Organisational Commitment

Surgimax holds a zero-tolerance stance on all forms of modern slavery, including forced labour, bonded labour, and human trafficking. We are committed to promoting ethical practices and protecting vulnerable workers within our business operations and across our supply chains.

### Policies Supporting Modern Slavery Prevention

We have implemented the following policies to reinforce our efforts: -

- **Supplier Code of Conduct:** Requires all suppliers to adhere to ethical labour standards, including prohibitions on forced labour, child labour, and human trafficking.
- **Ethical Recruitment Policy:** Prohibits recruitment fees charged to workers, ensures transparent employment contracts, and mandates due diligence on recruitment agents.
- **Child Labour Policy:** Ensures compliance with international standards, such as the ILO conventions, and prohibits employment of children under the age of 15.
- **Procurement Policy:** Mandates supplier risk assessments and ethical sourcing standards as part of our supplier selection and monitoring processes.
- **Employee Code of Conduct:** Outlines expectations for ethical behaviour, including the responsibility to identify and report instances of modern slavery.
- **Grievance Mechanism Policy:** Provides accessible and confidential reporting channels for employees and supply chain workers to raise concerns related to modern slavery.

### Governance and Oversight

The Board of Directors provides oversight for this policy. The policy is reviewed annually to ensure alignment with evolving best practices and regulatory requirements. All modern slavery concerns are escalated to senior management for immediate action.

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### **Due Diligence and Risk Assessment**

We conduct regular risk assessments to identify and mitigate modern slavery risks. This includes: -

- Mapping supply chains to identify high-risk areas.
- Conducting supplier audits, including site visits and worker interviews.
- Requiring suppliers to sign and comply with our Supplier Code of Conduct.
- Monitoring compliance through corrective action plans for non-compliant suppliers

### **Training and Awareness**

- We provide ongoing training to employees and key suppliers to: -
- Recognize signs of modern slavery.
- Understand reporting processes for suspected cases. Build capacity for ethical procurement practices.
- Specialized training is provided to procurement teams to enhance their ability to identify and address risks in our supply chains.

### **Remedy and Support for Victims**

Surgimax is committed to ensuring access to remedy for victims of modern slavery, including: -

- Compensation and rehabilitation support where violations are identified.
- Collaboration with NGOs and external agencies to address worker grievances.
- Immediate termination of contracts with suppliers who fail to address violations.

### **Monitoring and Reporting**

To evaluate the effectiveness of this policy, we track: -

- The number of supplier audits conducted.
- Compliance rates across supply chains.
- Incidents of non-compliance and remediation outcomes.
- We publish an annual Modern Slavery Statement summarizing our progress and initiatives.

### **Response and Remediation Time Frames (Service Level Agreements)**

- Reports of modern slavery risks or incidents will be acknowledged within 5 business days and investigated within 30 days.

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- Corrective action plans for suppliers found non-compliant must be submitted within 30 days of the report and implemented within 90 days.
- Progress on remediation will be communicated to stakeholders within 30 days of plan implementation.

**Communication and Accessibility**

This policy is: -

- Communicated to all employees and supply chain partners.
- Available on the Surgimax website in a prominent location.
- Reviewed and updated annually to reflect new risks and best practices.

<b>Reviewed By</b>			
Name (Position)	Naveed Alam (General Manager)	Date:	19/12/2025
Signed	<i>Naveed Alam</i>		

<b>Approved By</b>			
Name (Position)	Shahbaz Ahmed (Managing Director)	Date:	28/12/2025
Signed	<i>Shahbaz Ahmed</i>		