

# Modern Slavery Statement

## Introduction

This is Kinetik Medical Device Ltd statement on modern slavery and human trafficking pursuant to section 54 of the Modern Slavery Act 2015 and demonstrates our commitment to eliminating the risk of forced, bonded, compulsory labour or human trafficking within our own operation and supply chain.

This statement is made on behalf of Kinetik Medical Devices, a private company registered in England and Wales with registered company number 06778337.

## Organisation structure, our business and Supply chain

Kinetik Medical Devices Ltd has been supplying medical electronic devices and accessories into the market since 2008 and has grown to be one of the UK's largest suppliers in this field.

Kinetik Medical Devices Ltd is part of the Kinetik Technology Group Limited who have their registered headquarters in Marlborough, UK.

The Kinetik Technology Group is present in Europe and Asia, with direct commercial subsidiaries and sells its product to countries all over the world, remaining committed to creating innovations that bring affordable healthcare into every customer's home.

Kinetik Medical Devices Ltd supply chain is global and covers multiple sectors from raw material producers to packaging suppliers. We work with a wide network of third parties at all stages of the supply process.

Many of our Partners are established businesses operating within the electrical goods manufacturing marketplace with their own social and ethical policies. We expect all Suppliers and Partners to maintain a supply chain that is free from Modern Slavery and human trafficking and to conform to Kinetik Technology Group's policies in this area.

## Policies in relation to slavery and human trafficking

It is Kinetik Technology Group's ambition to uphold exemplary ethical standards within our supply chain and it is our expectation that our Supplier and Partners will do the same. In the event of suspected or known non-compliance, we will take remedial action which, in the most severe circumstances, includes terminating the relationship with that Supplier or Partner.

Kinetik Medical Devices Ltd has created a Modern Slavery Policy which we will be issuing to all employees followed by a training programme. This will also be incorporated into the Induction programme for new employees.

## Due diligence in relation to slavery and human trafficking in our business and supply chain

Local quality teams carry out due diligence and audits of our supply chain to check compliance with the Kinetik Technology Group Code of Ethical Conduct. Additionally, due

diligence and audits are carried out to the relevant Kinetik Technology Group Social Code of Conduct, as the location of the supplier premises dictate, and responses are recorded.

Our Business Partners, their suppliers and/or sub-contractors, as well as any other entity directly and/or indirectly belonging or being related, in any way, to the supply chain involved in the manufacturing of our products and/or of their parts, attachments and components, are requested to observe and to protect the rights of the Employees at any time and under any circumstance.

Safeguarding activity shall be performed both in observance of the local laws and of the European Convention on Human Rights principles, and it shall be applied regardless whether the Employees are directly or indirectly employed by our Suppliers or Partners. Unless it is otherwise specified, it is implicitly understood that our Suppliers or Partners are consequently bound to vouch for their suppliers and/or for their sub-contractors for the observance of the aforesaid Codes.

#### Parts of the business at risk

We have identified that our biggest current risks of exposure to modern day slavery sits within the product supply chains of our owned brands regional products. To combat this, we have an established programme of supplier assessment, which is delivered through our own regional quality teams supplemented, if necessary, by a small number of pre-approved third-party assessment bodies.

We have developed a programme that ensures our business partners and suppliers are fully aware of the standards and expectations that the Kinetik Technology Group require.

We want to work with suppliers who are open and transparent, so in order to reinforce this commitment, we request suppliers to agree to our right of unannounced visits at any time.

#### Effectiveness of measures

We recognise that we cannot achieve our aims without the support of our Suppliers and Partners and we have a responsibility to engage with our industry sector to tackle the growing issues surrounding Modern Slavery. All our Business partners and suppliers must agree to provide evidence of their related compliance programs. If our Quality teams identify any non-compliance, we work with our Suppliers on remedial action plans to ensure identified are addressed and corrected. If any supplier is unwilling to work with us to achieve compliance, we will, as a last resort terminate our business relationship.

#### Training of staff

To effectively tackle Modern Slavery and Human Trafficking, we must raise awareness across our business and industry sector, so that responsibility for identifying issues is shared by all employees if they witness any occurrences of bad practice.

We are rolling out a new programme to ensure all Kinetik Medical Devices Ltd staff and our Quality Auditing teams based in Hong Kong receive training in relation to Modern Slavery including how to escalate concerns.

### Further Steps

We will continue to build on the progress made to date. Our auditing of Suppliers will continue, and data obtained from this will be used to identify areas to focus on in future years.

We recognise our Ethical codes require continuing monitoring and review and we will continue to proactively identify and manage risks in our business and Supply chain.



James Grover

Sales Director

Kinetik Medical Devices Ltd

(Part of the Kinetik Technology Group)

14 August 2019