

## Modern Slavery Statement

### Organisation

This statement applies to Elemental Healthcare Ltd (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2018/19.

### Organisational structure

Elemental Healthcare Ltd was established in January 2007 and is a leading distributor providing innovative solutions in Minimally Invasive Surgery, Bariatric Surgery and Diagnostics. Elemental Healthcare Ltd was acquired by Surgical Innovations Group PLC with the acquisition completed on 31st July 2017. Elemental continues to operate as a separate subsidiary with no impact to procurement.

Working with market leading companies Elemental Healthcare Ltd has brought together a unique and exciting portfolio and aims to sell only “best-in-class” products. As the world struggles to fund healthcare as a consequence of the global financial crisis, there is a temptation to sell the cheapest instruments possible. We believe that in Healthcare, quality always wins in the end, and customers are always happier with a product that works well every time.

Elemental Healthcare Ltd employs a highly trained direct sales team providing national UK coverage supported by a dedicated Customer Service department based from our Head Office in Leeds, UK. The Directors, management and support staff have many years’ experience in the sales, training and product support of medical devices and have been involved in bringing many new innovative products to the market to enhance patient care. The organisation is controlled by a board of directors.

Our emphasis and focus at Elemental Healthcare is the provision of excellent service. It is our mission to provide our customers with a first-class experience when dealing with our sales department or with customer service team.

The labour supplied to the Organisation in pursuance of its operation is wholly carried out in our offices based at 6 Clayton Wood Bank, Leeds, LS166QZ

### Definitions:

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

### Commitment:

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

### **Potential exposure**

In general, the Organisation considers its exposure to slavery/human trafficking to be limited, nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

### **Supply chains**

In order to fulfil its activities of distribution of medical devices to hospitals throughout the UK the main supply chains of the Organisation include those related to our manufacturing partners.

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

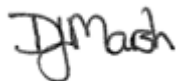
In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in its supply chains
- any actions taken to embed a zero-tolerance policy towards modern slavery
- any training provided to staff on modern slavery.

This statement is made in pursuance of Section 54 of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 12<sup>th</sup> August 2022

Signed:



Print name: David Marsh

Job Title: Chief Executive Officer, Surgical Innovations Group PLC

Date: 12.08.22