

## Modern Slavery Statement 2023 – British Medical Group

### INTRODUCTION

This is an annual statement made by the British Medical Group in accordance with its obligations under the Modern Slavery Act 2015 (the “Act”). It details steps the British Medical Group has taken, and is proposing to take, to address the risk of slavery and human trafficking taking place in its business and within its supply chain.

### GROUP STRUCTURE

The British Medical Group is a group of companies with interests in the development and supply of medical devices, personal protective equipment, and related healthcare supplies. It also holds interests in antimicrobial technologies, microbiological testing, and property management. Currently, group companies include:

- Chemical Intelligence Limited
- Sanitas Healthcare Limited
- Virologica Limited
- Groslands Limited

All are registered and principally operate within the UK. The companies employ appropriately educated, experienced and skilled professionals in accordance with their roles.

The companies have a risk-based approach to using suppliers for medical devices, personal protective equipment and related supplies from our UK operations which are assessed prior to engagement and deemed to be low risk. However, the British Medical Group purchases and supplies healthcare materials globally. The British Medical Group acknowledges that our global supply chains represent a higher risk in this regard.

### What is Modern Slavery

- 1) If a person / company commits an offense if they knowingly hold a person in slavery, servitude and forced or compulsory labour in accordance with Article 4 of the Human Rights Convention, which includes a person’s personal circumstances e.g., a child, family relationship, mental and physical illness which makes them more vulnerable.
- 2) A person / company commits an offence if they arrange or facilitates the travel of another person (“V”) with a view to V being exploited. This includes slavery, servitude forced or compulsory, sexual exploitation, removal of organs, securing services by force, threats or deception or securing services from children or vulnerable persons.

### POLICY

The British Medical Group is committed to conducting its business in a lawful and ethical manner. We will not tolerate modern slavery and human trafficking and applaud efforts being made globally to eliminate such practices. The British Medical Group expects its suppliers (including contractors and service providers) to support the elimination of such practices.

This statement supports our commitment to provide transparency by ensuring the public, consumers, and employees act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain. We will continue to update this statement and monitor its deployment and effectiveness.

This is the second annual statement on Modern Slavery by the British Medical Group. We remain committed to develop and review our procedure in this area at least annually. A new annual statement will be published on the websites. This formal policy will be cascaded to our suppliers (who must acknowledge the receipt of this policy), it will be available to our customers, the general public and suppliers either on the company's websites or upon request to ensure transparency.

Staff within the BMG Group will be trained on this policy.

### Due Diligence Processes For Slavery And Human Trafficking

Before a new supplier, contractor or service provider is approved - or upon contract renewal - then appropriate due diligence on the supplier will be carried out, this policy will be provided, and a receipt of acknowledgement must be signed with the statement that they understand and will abide with this Modern Slavery Policy. A work instruction is available to detail the due diligence.

The British Medical Group will view any breaches of Modern Slavery principles very seriously. In the event that we are informed of, or identify a breach of our supply chain policies or protocols we would undertake an appropriate investigation. The circumstances of the breach, the results of the investigation and any process improvements and enhancements implemented as a result would be fully documented and reported to CEO of the British Medical Group.

We encourage whistleblowing regarding Modern Slavery and will take reporting of this seriously.

We would seek to ensure all breaches were fully resolved appropriately and relevant remedies made available to potential victims. However, where improvements are not made, we may seek support from the following:

- UK Police Service
- The National Referral Mechanism UK
- The UK Modern Slavery Helpline

If abroad:

- Tailored to the local circumstances e.g. contact local NGOs, industry bodies, trade unions.
- Other local organisations
- Contact local government.
- Law enforcement

The safeguards listed above will be subject to ongoing review, and further measures may be implemented as required. It may be necessary to suspend the contract and find an alternative source to supply or manufacture if further measures implemented are not resolved.

**Robert Gros**  
Founder + CEO