

Modern Slavery Statement

Policy detail	Information
Policy owner	HR
Applies to	Rociale Healthcare Limited, Rociale Direct Limited including Wound Care
Supersedes	RHL-POL-037
Effective date	January 2026
Next review date	January 2027 or earlier if legislation changes

Modern Slavery Statement for the financial year ending 31 December 2025

Introduction

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and is the statement of Rociale Healthcare Limited and its subsidiaries within the UK for the financial year ending 31 December 2025. This statement details the steps taken by Rociale Healthcare Limited and its subsidiaries within the UK to prevent slavery, servitude and forced or compulsory labour; and human trafficking taking place in any part of their business or their supply chains.

Rociale Healthcare Limited recognises its legal and moral obligations to prevent forced, bonded or compulsory labour and human trafficking. Hence, Rociale Healthcare Limited is committed to strengthening and continuously improving its governance, oversight and due diligence processes regarding the fight against modern slavery and human trafficking.

Company supply chain

The supply of goods, services and products to the Company business units is managed by the procurement department. The procurement function deals with corporate social responsibility (“CSR”) and modern slavery due diligence as part of supplier selection and monitoring.

Although the Company’s main business locations are in Europe, the Company sources goods globally, particularly from the Indian subcontinent and Asia. Important work is being carried out to rationalise the Company’s panel of business partners. This work supports the implementation of ethics values, including with respect to the fight against modern slavery and human trafficking.

Assessment of Modern Slavery risk within our business

The Company believes that the main risks regarding modern slavery relate to its supply chain, especially suppliers in higher risk jurisdictions.

The Company’s supply chain is procured through the purchasing and procurement department working in conjunction with the Chinese procurement team.

Centralising the procurement of goods and services within one team results in better oversight of the Company’s supply chains. Furthermore, it ensures that the procurement process is carried out by a team who is appropriately trained in relation to ethical and responsible purchasing.

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On that basis, the Company conducts ongoing risk assessments using criteria such as geography, labour intensity, subcontracting, transparency and product category. The Company therefore focuses enhanced due diligence and monitoring in the Indian subcontinent and Asia in relation to suppliers selected by the Company.

Policies in relation to slavery and human trafficking

The Company has a zero-tolerance policy towards any breach of human rights, including modern slavery and human trafficking.

The Company is committed to operating in accordance with the law and to promote the highest standards of integrity, share its values with employees and business partners.

The Company's Responsible and Ethical Purchasing Charter sets out its expectations of business partners (such as suppliers) in relation to ethics, including with respect to human rights.

This Charter requires business partners to undertake to comply with its terms and limit their environmental impacts, work for sustainable development and act ethically.

Specifically, this Charter requires the Company's business partners to:

- recognise and respect the protection of internationally proclaimed human rights;
- abide and work in line with the United Nations Global Compact principles on human rights and labour;
- take part in the fight against any kind of corruption including extortion, bribery, influence peddling and facilitation payments;
- ensure the provision of a safe working environment for employees;
- strictly prohibit the use of child labour or any form of slavery, forced labour and human trafficking;
- ensure labour conditions are fair, employees are paid a regular salary in accordance with their employment contracts and the law, and all legal requirements are complied with; and,
- prevent any form of discrimination such as personal characteristics including age, ethnicity, political opinion, origin etc.

Due Diligence and management of modern slavery risk

The Company implements global policy with its business partners, mainly suppliers, through audits that may be carried out either directly by the Company or with the help of independent audit providers. These audits are intended to check that business partners are applying the Company's ethics principles.

In order to ensure robustness and effectiveness of audit operations, the Company operates an audit methodology which comprises the following elements:

- Establishing objective and explicit criteria to assess how strategic a business partner is to the Company;
- Evaluating business partners with respect to CSR (through reference to international norms such as ISO26000 or SA8000 or through compliance with international auditing standards such as SEDEX/SMETA, BSCI); and

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- Risk based scheduling of audits depending on geography, labour intensity- and historic performance.

The process also allows the Company to prioritise business partner audit operations.

If, on completion of an audit, a business partner is found not to be in compliance with the Company's ethical principles, the partner will be required to implement necessary corrective actions. Alternatively, the Company may terminate the business relationship and/or exclude such partner from invitations to tender.

Monitoring effectiveness

In 2025 the Company conducted 5 audits at business partner premises. These audits did not reveal any serious compliance breach. No concerns relating to modern slavery have been raised through audits since 2020.

To enhance monitoring effectiveness, the Company will also:

- Track year on year audit findings trends;
- Maintain a central evidence register;
- Monitor corrective action completion rates;
- Review supplier performance quarterly for higher -risk partners.

Training

It is important that the Company's staff are aware of and understand the risks of slavery and human trafficking. Staff must be able to identify signs of slavery and human trafficking and be aware of what action to take if such activities are suspected.

The Company will implement training for Procurement, Supply Chain, HR, and operational management, with refresher training annually.

Further steps and monitoring

The Company is aware of the pernicious nature of modern slavery and therefore understands that the steps regarding risk associated with modern slavery should not be static. The Company will continue to monitor operational practices, review its approach and continue to build on this in the year ahead.

The Company has identified the following as key actions for 2026:

- continuing review of strategic business partners;
- strengthening supply chain mapping to improve visibility beyond Tier 1 suppliers;
- implementing a formal two year audit plan for all manufacturing locations in scope of NHS supply;
- developing corrective action (CAPA) templates including root cause, preventative actions, deadlines and accountability;

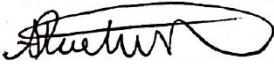
Approval

This statement was updated and approved by the Board of Directors of Rociale Healthcare Limited and is signed on behalf of the Board by:

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Sarah Lewis
Procurement Manager



Andy Stonehouse
CEO