



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 30 June 2025.

BioSpectrum Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in our own operations, our supply chain and our products. We have zero-tolerance towards slavery and require our supply chain to comply with our values. Staff are expected to report their concerns and management to act on them.

Organisational structure and supply chains

BioSpectrum Ltd supply medical equipment to hospitals. We work with several key direct suppliers from Europe, North America and Asia, who provide us with medical devices for distribution to hospitals within the NHS and private sector. For more information about the Company, please visit our website: www.biospectrum.co.uk.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include the following:

- o Company Code of Conduct - We operate this policy to ensure our suppliers operate in full compliance with the laws and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.
- o Corporate Social Responsibility Statement – This policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities
- o Whistleblowing Policy - We operate this policy so that employees are able to raise concerns about how staff are being treated or practices within our business or our supply chains without fear of reprisal.
- o Procurement policy - We want to make sure that potential suppliers are committed to ensuring that slavery and human trafficking is not taking place within their own supply chains. Our procurement policy and supporting procedures set out controls and checks undertaken to help verify this. We make sure our suppliers are aware of our policies and adhere to the same standards.



Due Diligence Processes for Slavery and Human Trafficking

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- o Internal supplier audits
- o External supplier audits
- o Building long-standing and transparent relationships with suppliers
- o Making clear our expectations of business partners
- o Evaluating the modern slavery and human trafficking risks of each new supplier

Our due diligence procedures aim to:

- o Identify and action potential risks in our business and supply chains
- o Monitor potential risks in our business and supply chains
- o Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- o Provide protection for whistle-blowers.

Risk and Compliance

BioSpectrum has evaluated the nature and extent of our exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- o Evaluating the slavery and human trafficking risks of each new supplier
- o Creating an annual risk profile for key suppliers
- o Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping

We consider that we operate in some high-risk environments because the business purchases medical devices from China and India, where it is recognised that there is a potentially greater exposure to modern slavery as human rights protections are more limited.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.



Effectiveness and Performance Indicators

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs include:

- o Number of whistleblower reports
- o Number of issues documented within the supply chain
- o Number of employee tribunals
- o Number on non-conformances
- o Number of supplier assurance questionnaires returned
- o Number of objectives and targets achieved
- o Number of risk assessments carried out and their results
- o Number of observations for improvement documented during internal audits
- o Number of staff training opportunities completed

Training our staff

BioSpectrum requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high risk scenarios, including their removal from the Company's supply chain.

Ratification

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Adam McQuilkin

Position: Managing Director

Date: 1st July 2024

Signature:

A handwritten signature in blue ink, appearing to read "Adam McQuilkin", written over a horizontal line.