

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Lifespan Medical Ltd | Company number 15434787
Financial year ended 31 January 2026

This is a voluntary statement. Lifespan Medical Ltd does not currently meet the £36 million annual turnover threshold that makes publication mandatory under section 54 of the Modern Slavery Act 2015. We nevertheless publish this statement to explain the proportionate steps and framework we have established to identify and manage modern-slavery risks as our business and supply chain develop, including in support of NHS and wider public-sector procurement.

1. Organisation, business and supply chain

Lifespan Medical Ltd is a UK-registered small and medium-sized enterprise established to supply medical devices, medical equipment and related services to NHS and private healthcare customers in the United Kingdom. Its registered office is 727–729 High Road, London N12 0BP, United Kingdom.

We are an early-stage, UK-based business and do not operate overseas offices.

2. Governance and policies

The Board of Directors has overall responsibility for this statement. Day-to-day responsibility for modern-slavery risk, supplier escalation and incident response rests with a Director.

Our zero-tolerance approach to slavery, servitude, forced or compulsory labour, child labour and human trafficking is supported by the following policies:

- Ethical Employment Policy
- Equal Opportunities Policy and Equality and Diversity Policy
- Anti-Bribery and Anti-Corruption Policy
- Corporate Social Responsibility Policy

These policies require compliance with applicable law and prohibit forced labour, worker-paid recruitment fees, confiscation of identity documents, unlawful child labour, discrimination, harassment, threats and restrictions on lawful freedom of movement or association.

3. Risk assessment and management

We apply a proportionate, risk-based approach and do not describe any supply chain as having no risk. In assessing a supplier or procurement, we consider the six characteristics reflected in current government and NHS guidance: industry type, nature of the workforce, supplier location, operating context, type of commodity and the business or supply-chain model.

Potentially relevant risk factors include:

- international manufacture of medical equipment, electronics, components and consumables;
- limited visibility below Tier 1 and the possible use of labour-intensive subcontracting;
- logistics, warehousing and other outsourced services; and
- commercial practices such as unrealistic pricing, short lead times, inaccurate forecasts, late changes and extended payment terms that could place pressure on suppliers or workers.

We seek to plan and communicate requirements reasonably and to avoid purchasing practices that could contribute to exploitative working conditions. Risk will be reviewed before onboarding a material supplier, when relevant information changes and during the annual review of this statement.

4. Supplier due diligence and contractual expectations

During the reporting period, Lifespan Medical Ltd remained in a market-development phase. We have established the following proportionate framework to be applied as supplier relationships increase:

Depending on the assessed risk and the information reasonably available, future onboarding or review may include:

- confirming the supplier's legal identity, ownership, operating locations and role in the supply chain;
- reviewing its modern-slavery statement, policies, certifications or equivalent evidence where relevant;
- requesting information on manufacturing locations and material subcontractors for higher-risk goods or services;
- considering credible adverse information and requiring clarification or corrective action; and
- including proportionate obligations to comply with applicable modern-slavery law, provide relevant information and notify Lifespan Medical Ltd of suspected or confirmed incidents connected with the goods or services supplied.

Due diligence is not a guarantee that modern slavery cannot occur. Where a concern is identified, we will assess the facts, the potential impact on affected people and the supplier's willingness and ability to remedy the issue. Audit or independent evidence may be requested where proportionate.

5. Reporting, investigation and remediation

Employees, contractors, suppliers and other stakeholders may raise a concern confidentially using the contact details published on our website and marking it for the attention of a Director. No employee or contractor will suffer retaliation for raising a genuine concern in good faith.

A credible allegation will be escalated to a Director without delay and an initial assessment will begin within two working days. We will preserve confidentiality where possible, secure relevant information, cooperate with competent authorities where appropriate and take a victim-centred approach. Corrective action, enhanced monitoring, suspension or termination may be used according to the seriousness of the issue. We will not terminate automatically where doing so could worsen harm to affected workers and a safe, credible remediation plan is available.

6. Training and awareness

Directors involved in procurement or supplier management, and any future personnel undertaking those activities, will be required to receive proportionate awareness training. Training will cover indicators of forced labour and trafficking, how to report concerns, procurement risk factors and relevant responsibilities. It will be provided at induction where relevant and refreshed periodically according to role and risk.

7. Supporting NHS procurement

The National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025 place risk-assessment and proportionate risk-management duties on relevant public bodies procuring for the health service in England. Those duties do not make Lifespan Medical Ltd directly responsible for the public body's assessment; however, we will support reasonable and proportionate requests made through NHS procurement and contract management.

Where relevant to the contract and requested by the contracting authority, we will:

- provide reasonably available supply-chain information, including relevant OEM and manufacturing-location information;
- complete the Modern Slavery Assessment Tool or an equivalent assessment where proportionate;
- agree relevant modern-slavery contract terms, improvement actions and outcome-focused KPIs;
- notify the contracting authority of a material suspected or confirmed incident connected with contract delivery, subject to lawful confidentiality and safeguarding considerations; and
- cooperate with proportionate monitoring, remediation and reassessment if the risk profile changes.

8. Effectiveness measures and next steps

As an early-stage SME, we do not yet have sufficient year-on-year data for meaningful trend analysis. During the next reporting period, we will monitor the following proportionate measures and report progress in the next statement:

Measure	2026/27 target
Relevant directors and procurement/supplier-management personnel completing required awareness training	100%
New material suppliers receiving a documented proportionate risk assessment	100%
Higher-risk corrective actions reviewed by their agreed due date	100%
Credible allegations escalated to a Director and initially assessed	Without delay / within 2 working days
Board review of this statement and the underlying risk assessment	At least annually

Our priority actions for the next reporting period are to:

- maintain a Tier 1 supplier register and introduce documented risk categorisation for material suppliers;
- strengthen supplier questionnaires and proportionate contractual wording;
- improve supply-chain mapping for higher-risk products and services;
- maintain training and incident-response records; and
- review whether an MSAT or equivalent assessment should be completed for relevant NHS contracts.

9. Approval and publication

This statement must be approved by the Board of Directors of Lifespan Medical Ltd before publication and will be reviewed at least annually. Once approved, the latest statement will be made available through a prominent link on the Lifespan Medical Ltd website. Previous statements will be retained where practicable to demonstrate progress.

Signed by: Simon Goldberg, Director, for the Board | **Board approval date:** February 2026