

Modern Slavery and Human Trafficking Statement

Financial Year Ending: 2024 / 2025

Date of Approval: *January 2025*

Introduction

Aqua Medical is committed to conducting our business ethically, responsibly, and with respect for fundamental human rights. We recognise that modern slavery and human trafficking are significant global issues affecting all industries and sectors. Aqua Medical maintains a zero-tolerance approach to any form of slavery, servitude, forced or compulsory labour, and human trafficking within our business and supply chains.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and outlines the steps we have taken during this financial year to prevent modern slavery and human trafficking in our operations.

Our Organisation and Structure

Aqua Medical operates within the healthcare sector, providing medical equipment, consumables, and services across the UK and internationally. The company headquarters is located in *(Birmingham, UK)*, and we work with a range of suppliers and distribution partners globally.

Our supply chains involve the sourcing of medical devices, sterile consumables, packaging materials, and logistics services.

Policies and Commitments

We have implemented robust internal policies to safeguard against modern slavery risks, including:

- **Ethical Sourcing and Procurement Policy** – requiring suppliers to adhere to internationally recognised labour standards.
- **Supplier Code of Conduct** – setting clear expectations on human rights, working conditions, and compliance with anti-slavery laws.
- **Whistleblowing Policy** – enabling employees, suppliers, and stakeholders to confidentially report any concerns related to modern slavery.
- **Employment Policies** – ensuring that all employees work voluntarily, are of legal working age, and are provided with fair pay and conditions.

Due Diligence in Our Supply Chains

Aqua Medical applies a risk-based approach to managing potential exposure to modern slavery in our supply chains. Our due diligence includes:

- Conducting supplier risk assessments based on geography, sector, and sourcing category.
- Requiring suppliers to complete a modern slavery compliance questionnaire during onboarding.
- Including contractual obligations in supplier agreements that prohibit forced labour and require compliance with the Modern Slavery Act.
- Reviewing and monitoring suppliers periodically to confirm adherence to our standards.

Training and Awareness

To ensure awareness and understanding of modern slavery risks, Aqua Medical provides training and resources for relevant employees, including:

- Training for procurement and supply chain teams on identifying signs of modern slavery.
- Awareness materials for all staff to reinforce our zero-tolerance approach.
- Guidance on reporting mechanisms and escalation processes.

Effectiveness and Performance Indicators

We assess the effectiveness of our anti-slavery measures by:

- Monitoring supplier compliance and taking corrective action when necessary.
- Reviewing any reports or concerns raised through whistleblowing channels.
- Evaluating audit findings and supplier performance against our ethical standards.

No instances of modern slavery were identified in our operations or supply chains during this reporting period.

Future Steps

In the next financial year, Aqua Medical intends to:

- Enhance supplier audit processes with specific modern slavery risk assessments.
- Strengthen training modules for higher-risk business functions.
- Continue to review and update policies to reflect evolving best practices.

Approval

This statement has been approved by the Board of Directors of Aqua Medical and signed on its behalf by:

Name: *Kenneth Hall*

Position: *Managing Director*

Date: 1st January 2025

