Modern Slavery Policy Statement Eurosurgical

This statement is aimed to demonstrate what steps are being taken by the Eurosurgical and our management team to ensure that our business, our employees, our suppliers, and our customers are aware of the meaning of Modern Slavery practice. Where possible, to ensure that the appalling effects that these practices can have on people around the world, are not associated with the products and medical devices that Eurosurgical supply to our customers in the UK. The policy will cover these specific areas of our business.

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

1. Organisation structure and supply chains.

Eurosurgical are a Medical Device Supply company based in the UK, at our offices in Guildford, Surrey. Eurosurgical specialise in the supply and distribution of imported medical devices to our customers, which includes the NHS, Private Hospitals, Private Medical Practices and the public. Our office comprises of warehousing, customer services, accounts and management structure. Our sales team are located around the UK working from their home locations. Our "internal office staff" conduct our daily business of receiving and distribution of medical devices and goods.

The Medical devices that Eurosurgical supply are sent to our office from Medical Device Manufacturers (our suppliers) that are located around the world. Eurosurgical has exclusive distribution agreements with manufacturers to supply goods to UK customers.

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VAT No. 520625675 Registered in England & Wales Reg No. 4336596

2. Policies in relation to slavery and human trafficking

Eurosurgical recognise that any forms of slavery and human trafficking is an abhorrent act that has no place in society and our business. Starting with our own business, Eurosurgical have a number of policies relating to Labour Standards in our Workplace which includes;

- Equality policy
- Health & safety
- Equal fair pay
- Grievance procedures
- Harassment and anti-bullying policy

Eurosurgical also work with externally audited Standard Operating Procedures, for both Supply business and Environmental issues and comply with ISO9001:2015 and ISO14001.

As part of our Standard Operating Procedures we maintain An Approved Suppliers document, which includes maintenance of policy standards, certificates and relevant manufacturer approved documents.

The main business of Eurosurgical is to Supply Medical devices to our customers, which includes the NHS, Private Hospitals, Clinics and the public. Our responsibility on Modern Slavery Policy also extends to our customers and we welcome opportunities to work with our customers to understand their procedures in these area's.

3. Due Diligence Process

As part of our Approved Suppliers Doc (ISO9001;2015) Eurosurgical audit all of our Suppliers with regular visits, reviews and discussions that include our position with regards to our Modern Slavery Statement and other related policy documents, currently including;

- Ethical Trading policy,
- Corporate Social responsibility policy,
- Going Green Statement,
- Eurosurgical Carbon Reduction Plan,
- Social responsibilities and practices.
- Eurosurgical sustainability statement
- Labour standards

This list of policies and procedures can be adapted to circumstances and findings from the discussions with our Suppliers.

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4. Risk Assessment and Management

The majority of Eurosurgical Suppliers are based in Europe or the USA, however Eurosurgical are aware that many of the medical devices we are supplied are manufactured in other countries, including China, Pakistan and India, then re-packaged and sterilised in Europe or the USA. We currently inform all our Suppliers that Eurosurgical adhere to our Modern Slavery Policy and Statement, and ask that they inform us of any suspected breeches in relations to their own supply chain. Production of all products that Eurosurgical supply should meet the International Standards and local Medical Device Standards. We do not engage in actively looking for the "cheapest" device in the market and are very keen to provide clinically tested and approved products only.

5. Key performance indicators to measure effectiveness

Eurosurgical can measure performance within our own organisation by several internal factors that are also part of our ISO QMS, this includes, but is not limited to;

- Staff churn
- Staff complaints or grievances
- Staff annual review

To understand our Suppliers, Eurosurgical management use other "tools" to help identify "trends and activities" that may flag up as abnormal events, this includes, but is not limited to;

- Monitoring of Regulatory and standard's certification
- Monitoring deliveries and product supplies, particularly product shortages and explanations of these events
- Monitoring staff churn at Supplier level
- Meetings and discussions with Suppliers (held at least annually)
- Watching for changes to goods or practices without due notification
- Assessing Product Reliability and Product complaints
- Assessing whether issues are dealt with or taken seriously by supply company if and when reported by Eurosurgical

Eurosurgical supplies products to our customers, although we have limited access or knowledge of our customers behaviour, we do also monitor and assess any abnormalities for our customers if the situation arises. As many of the Medical Devices we supply are exclusive and very specialised, our office and sales staff are often asked for "assistance" and training on these devices.

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6. Training on modern slavery

All Eurosurgical staff undergo training which includes our policies (listed above). In addition, Eurosurgical use professional training providers that provide training covering Modern Slavery. Part of our management control processes ensure that all staff update their training annually and carried out appropriate training in line with industry business standards.

The above Statement is Reviewed Annually at Board Level.



Peter Cranstone
Managing Director

Date 01 June 2025

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