Modern Slavery Statement

Kebomed UK Ltd | Financial Year 2026

1. Our commitment

Modern slavery is a serious crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour and human trafficking, and can occur in any industry or supply chain.

Kebomed UK Ltd ("Kebomed UK", "we", "our" or "us") is committed to conducting business ethically, responsibly and with integrity. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to taking proportionate steps to identify, assess and address the risk of these practices within our business and supply chains.

Although Kebomed UK is not currently required to publish a statement under section 54 of the Modern Slavery Act 2015, we choose to publish this statement voluntarily to communicate our approach, actions and ongoing commitments.

2. About Kebomed UK

Kebomed UK is an independent medical device distributor operating in the UK, with a focus on minimally invasive gynaecology, urology, enteral feeding and general surgery. Our business relies on relationships with employees, manufacturers, suppliers, service providers and other business partners.

3. Our supply chain

We source medical devices and associated goods and services from a range of suppliers, including international manufacturers. We recognise that modern slavery risks may exist at different levels of a supply chain and that visibility of direct suppliers does not necessarily provide visibility of all upstream activities.

We expect our suppliers, contractors and business partners to uphold appropriate ethical, human rights and labour standards and to work with us to address concerns or identified risks.

4. Policies and governance

Our approach is supported by internal policies and procedures intended to promote ethical conduct, protect workers and provide routes for raising concerns. These include:

- Ethical Trading, Human Rights and Labour Standards Policy
- Supplier Sustainability Audit
- Supplier Code of Conduct
- Whistleblowing Policy
- Subcontractors and Supplier Policy

These policies are made available within Kebomed UK and communicated to relevant suppliers. The Managing Director has overall responsibility for this statement and our approach to modern slavery.

5. Risk assessment and due diligence

We use a risk-based approach to supplier assessment and due diligence. Our assessment considers relevant indicators, including country and sector risk, manufacturing activity, workforce vulnerability and other information available to us. We use external sources to inform our assessments, including the Global Slavery Index, the US Department of Labour's list of goods associated with child or forced labour, and information published by the International Labour Organization.

Our due diligence activities may include:

- Supplier selection and review against our policies and standards
- Supplier questionnaires and self-assessment audits
- Assessment of risk indicators and supply-chain information
- Review and monitoring of identified risks
- Escalation of concerns and appropriate corrective action

Our supplier assessment process categorises suppliers according to identified risk factors. During the FY2025 assessment, four suppliers were identified as medium risk and no suppliers were identified as high risk. Manufacturing was a risk indicator for core suppliers; where no additional risk indicators were identified, suppliers were assessed as low risk. Three of the medium-risk suppliers had manufacturing-related risk factors and a medium vulnerability score. One supplier had a risk indicator relating to temporary workers.

Supplier self-assessment questionnaires are scheduled annually for medium- and high-risk suppliers and every two years for low-risk suppliers. UK suppliers are also subject to review through our ISO 9001 internal audit process, with relevant matters recorded through management review.

6. Supply-chain risk and areas for development

Our assessment indicates that the overall risk within our direct (Tier 1) supply chain is low, based on the structure of our business and the assessments undertaken. We recognise, however, that risk can exist regardless of supplier location and that our visibility of upstream supply chains remains an area to develop.

We have not yet mapped our Tier 2 supply chain. We have identified this as an opportunity for improvement and will continue to consider how to increase supply-chain transparency, prioritising areas where our risk assessment indicates this would be most valuable.

7. Employee awareness and training

Modern slavery awareness training is mandatory for employees and is delivered through an independent third-party e-learning provider, Tick the Box Compliance Solutions. Training covers indicators of modern slavery, how to report concerns, modern slavery statement requirements, procurement-related risks and practical due diligence.

Employees complete a competency-based assessment. Training is undertaken on induction and refreshed annually. Employees are expected to remain alert to potential indicators of exploitation and raise concerns through the appropriate reporting channels.

8. Reporting, response and remediation

Employees are required to raise suspected modern slavery concerns with their line manager. Concerns may also be raised through the applicable whistleblowing arrangements. Potential victims should not be confronted directly, as this could increase risk to their safety.

Where concerns relate to a supplier, we will assess the circumstances and, where appropriate, work with the supplier to implement corrective actions, provide support or guidance and undertake further monitoring or audit. Where concerns are serious, unresolved or the supplier fails to take appropriate action, we may reconsider or terminate the commercial relationship. We will consider the safety and welfare of affected individuals when deciding how to respond.

Where appropriate, we may seek advice or support from relevant non-governmental organisations, industry bodies, trade unions, government or law-enforcement agencies.

9. Effectiveness and key performance indicators

We review the effectiveness of our approach through management oversight and key performance indicators. Our key areas of monitoring include:

- Modern slavery concerns identified, investigated and remediated
- Annual review and update of this statement and related assessment
- Supplier completion of self-assessment questionnaires, including modern slavery questions
- Completion of mandatory employee awareness training
- Review of supplier risk ratings and follow-up actions

We will continue to review these measures and develop additional indicators where appropriate, with progress and improvement actions captured through management review.

10. Priorities for the next reporting period

Our ongoing priorities include:

- Continue risk-based supplier due diligence and review of supplier risk ratings
- Maintain supplier questionnaires, audit and monitoring arrangements
- Maintain mandatory employee training and awareness
- Improve visibility of upstream supply chains, including consideration of Tier 2 mapping
- Review and develop KPIs to monitor the effectiveness of our approach
- Document actions and progress through management review

11. Approval and review

This statement is reviewed by senior management, approved and signed by the Managing Director, and published on the Kebomed UK website. It is also shared with employees, suppliers and other relevant stakeholders. Uploaded onto our website and the below websites

- https://modern-slavery-statement-registry.service.gov.uk
- https://tiscreport.org

This statement relates to Kebomed UK Ltd and the financial year 2026/7

Approved by: Gordon Laws
Position: Managing Director

Signature: Gordon Laws

Date: 21 November 2026