

Modern Slavery Act Statement

Convatec Group Plc

26 June 2026

Background

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Incidents of modern slavery can occur in any sector, industry, and geographic region.

Section 54 of the UK Modern Slavery Act 2015 requires that each organisation within the United Kingdom which has an annual turnover in excess of £36 million produces an annual public statement, approved by the board of directors, detailing the steps it has taken to prevent slavery and human trafficking in its local and global operations and full value chain. At Convatec, we take this as an opportunity to reflect on and describe the ways in which we live our values of 'Do what's right' and 'Own it', and how that impacts our operations, people, culture and other stakeholders.

With more than 10,000 colleagues, we provide our products and services in around 90 countries, united by a promise to be **forever caring**—a promise we extend to all our stakeholders. Our vision of **Pioneering trusted medical solutions to improve the lives we touch**, refers not only to the lives of those who use our products, but also the lives of our colleagues and all those involved in our supply chain.

Convatec has zero tolerance for any form of modern slavery in our operations and supply chain.

We are committed to preventing slavery and human trafficking, and so we implement policies and processes to prevent, assess, detect and report violations within entities listed in our [2025 annual report](#) (pages 182-184) which, by extension, includes how we support customers, as well as through our supply chains. This statement, which is published in accordance with Section 54 (1) of the Modern Slavery Act 2015, outlines our approach and activities during the period 1 January to 31 December 2025, and the described approach remains in place at the date of publication. This statement also serves to meet similar reporting requirements for other countries around modern slavery and human trafficking.

Our approach

Aligned to our vision, promise and values, this statement reflects how we run our business to meet our commitment to preventing modern slavery in our business and supply chain.

Our values are:

- **Improve care:** We are passionate about serving and supporting people with deeply personal and challenging medical conditions
- **Deliver results:** We consistently deliver excellent work, say what we do and do what we say
- **Grow together:** We help our colleagues around us grow, develop and thrive, so we can all fulfil our potential
- **Own it:** We take personal ownership of all our work: demonstrating initiative, innovating, taking smart risks and never settling for second best
- **Do what's right:** We behave ethically and exemplify the highest standards of integrity in every area of our work to make a positive difference

Our business decisions at all levels must embody these values to ensure we embed ethical behaviours in everything we do. In doing so, we earn trust, build stakeholder confidence and ensure that, at all times, we act with integrity and do what we say we will do.

All colleagues share responsibility for ensuring that modern slavery is not tolerated. To maintain strong awareness of how to identify and prevent it, Convatec has a cross-functional Human

Rights Committee that keeps our structures and processes aligned with changing internal and external conditions and stakeholder expectations.

For the purposes of this statement, we break down our approach to preventing modern slavery in our business and supply chain into the following key sections:

- Organisational structure and supply chain
- Human rights policies and governance
- Risk assessment and due diligence processes related to slavery and human trafficking
- Response to identified issues
- Training on modern slavery and trafficking
- Effectiveness

This statement details our activities and approach in each of these areas.

Our organisational structure and supply chain

Understanding our organisational structure is essential to modern slavery prevention because it clarifies how our operations, supply chain, and governance are organised across global markets. This enables us to identify areas of risk, allocate responsibility, and embed ethical practices throughout the business, ensuring that our policies and procedures are effectively implemented and monitored wherever we operate. By detailing our structure, we support accountability and facilitate targeted action to prevent modern slavery, allowing us to uphold our values and commitments in every region and care category.

Convatec develops and produces innovative medical solutions that give people living with certain chronic conditions improved confidence, freedom and mobility.

Our operations and supply chain are global. We market and sell our products and services in around 90 countries and, as at December 2025 and to date, owned and operated seven manufacturing facilities located in six countries: the UK, Denmark, the United States, Slovakia, the Dominican Republic and Mexico. Our Group structure includes over 50 active companies. This statement is relevant to all our active companies, including the following three active companies located in the UK: Convatec Group Plc, Convatec Limited and Amcare Limited.

We market and sell our products and services in four care categories. We have a direct presence in certain markets and an extensive network of wholesalers and distributors in other markets.

- **Advanced Wound Care** (31% of 2025 revenue): advanced wound dressings for the management of chronic wounds resulting from ongoing conditions, such as diabetes, and acute conditions resulting from traumatic injury and burns.
- **Ostomy Care** (28% of 2025 revenue): devices, accessories and services for people with a stoma (a surgically-created opening where bodily waste is discharged), commonly resulting from causes such as colorectal cancer, inflammatory bowel disease and bladder cancer.
- **Continence Care** (22% of 2025 revenue): products and services for people with urinary continence issues related to spinal cord injuries, multiple sclerosis, spina bifida and other causes.
- **Infusion Care** (19% of 2025 revenue): disposable infusion sets for diabetes insulin pumps, or for pumps used in continuous subcutaneous infusion treatments for conditions such as Parkinson's disease.

Further information about our business, markets, products and financial performance is included in our 2025 Annual Report and Accounts which can be [viewed here](#).

Our suppliers provide raw materials (e.g. chemicals, adhesives, films, PVC compounds, etc.), part finished products (e.g. moulded items), finished products, services (e.g. sterilisation) and research and development support. The majority of our spend is concentrated towards a

relatively small number of suppliers. A supplier's industry is related to how its risk is assessed, as described in the section 'Due diligence processes' below.

Given the relative concentration of suppliers engaged in our contract manufacturing and logistics spend, we prioritise depth of engagement around responsible business practices with our key suppliers.

In 2025, we mapped some of our sub-suppliers (Tier II supply chain), based on shipping data, as part of wider efforts to identify higher risk dependencies linked to business resilience and risk (such as a Tier II supplier supplying more than one of our key suppliers). The identified Tier II suppliers are now included in our real-time risk profiling tool which, as described further on page 5, alerts us of developments concerning fraud, corruption, natural disasters, and labour rights incidents.

We are committed to working with our suppliers to address any concerns they have, including sharing best practices wherever requested. This occurs during supplier meetings, visits, and more formally through addressing corrective actions after a self-assessment or audit, as described in the section 'Due diligence processes.'

Our human rights policies and governance

Policies

We implement a number of policies and codes designed to tackle modern slavery, people trafficking, and human rights and ethical behaviour more broadly. We publish these policies and codes on our website, and they can be [viewed here](#).

Our human rights policies set clear expectations, embed standards into our operations and supply chain, and provide the framework for preventing, identifying and responding to risks. We assess their effectiveness through evidence of implementation, including their integration into supplier contracts and procurement processes, training completion and improvements, strengthened risk monitoring systems, and oversight by our Human Rights Committee. Together, these measures demonstrate that our policies are actively shaping behaviour and contributing to improved identification and management of modern slavery risks.

Our Code of Ethics and Business Conduct (Code), underpins our human rights approach. The Code sets clear expectations for ethical behaviour and labour standards across all employees. It makes clear, with practical examples and definitions, what amounts to modern slavery – and empowers employees to recognise and thereby avoid the introduction or harbouring of modern slavery or human trafficking within our day to day operations. It provides a clear process for raising concerns and reinforces accountability, supporting early identification and response to potential issues as part of our overall control environment.

Referenced in our Code, our Human Rights and Labour Standards Policy (Policy), which applies to our own operations and employees, as well as to our supply chain, specifically addresses the United Nations Universal Declaration on Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact. The Policy includes: our process for evaluating suppliers to ensure they align with our principles and practices; our approach to labour standards, including compliance with relevant laws and regulations in the countries in which we operate; and an explanation of the role of the Convatec Human Rights Committee in monitoring implementation of the policy and leading any additional steps required. The Policy states that "Convatec does not accept nor condone any form of modern slavery whether forced, compulsory or trafficked labour. Without limitation, Convatec does not engage sweatshop labour, convict labour or indentured labour under penal sanction."

Our Sustainable Procurement Policy sets out the requirements that apply throughout the procurement lifecycle, from sourcing to supplier relationship management with respect to human rights and the environment. It lays out our expectations of suppliers and the remediation and governance process if issues are detected.

Our Global Third-Party Compliance Manual (Manual), translates our human rights expectations into practical requirements for suppliers and other business partners, ensuring risks such as modern slavery are proactively identified, assessed and managed through onboarding, due diligence and ongoing oversight processes. The Manual also includes reference to our Anti-bribery and Anti-corruption policy. It reinforces accountability by embedding consistent controls and escalation pathways across third-party relationships, supporting earlier detection and more effective remediation of potential issues.

Every Convatec employee is required to report any actual or potential violation of either the Policy or the Code and communication channels are in place within the Group to facilitate and encourage such reporting, including an independently-managed confidential Compliance Helpline, described further below.

Like many medical device companies, in many markets, our products are sold by third party channel partners, such as distributors, dealers or wholesalers. We evaluate these channel partners prior to engagement (see further below, 'Due diligence process') and our agreements set our channel partners' legal obligation to comply with all applicable laws and regulations and the Manual. We also require that the Manual is cascaded with any parties in their value chain that are involved in Convatec business, and reserve the right to undertake audits to ensure compliance by our channel partners.

The Manual is also incorporated in the undertakings of our suppliers, as part of Supplier T&C's in all Purchase Orders, and described on our website [here](#).

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Governance

Our cross-functional Human Rights Committee, chaired by the Chief People Officer and including our General Counsel & Company Secretary, includes members of senior management from our Supply Chain, Procurement, Human Resources, Legal and Compliance, and Global Corporate Affairs teams. The Committee met twice in 2025 and will continue to meet biannually in 2026. Its scope of work includes:

- Overseeing audits of business partners/third party adherence to our global human rights policies, standards and practices
- Review of the annual Modern Slavery Act Statement to support disclosure arrangements follow any changes in stakeholder expectations and sharing best practices on Human Rights-related topics to further embed these across the Group and its operations
- Commissioning additional activities in furtherance of our global human rights policies, standards and practices that further embed these in our business operations such as education and training of employees and third parties.

In 2025, the Human Rights Committee oversaw achievement of high training completion rates, extensive supplier risk coverage and measurable improvements in supplier performance, supported by targeted audits and enhanced real-time monitoring tools. Together, these outcomes demonstrate that our policies and controls are embedded in practice and contributing to improved identification and management of modern slavery risks.

Due diligence processes for slavery and human trafficking

Risk assessment

Based on ongoing internal evaluation and recent third party evaluation of our business structure and operations, we have assessed the risk of presence of modern slavery and human trafficking

within our direct operations to be low. External evaluation was carried out with Sedex in 2025, which confirmed that our policies and controls are appropriate and effective in helping us to keep this risk low.

To help protect against the risk of suppliers and third parties acting unethically, our teams conduct a range of risk assessment, due diligence and related activities.

First, the majority of our suppliers are initially screened by a third-party platform, EcoVadis IQ. Criteria considered include geography, industry and historical performance. Suppliers identified as being at higher risk of harbouring or failing to prevent modern slavery are required to complete a Sedex self-assessment questionnaire (SAQ) at locations that manufacture Convatec products, provide raw materials or store our goods.

In 2025, we commenced an additional screening process. This process uses an advanced risk profiling tool that provides real-time alerts on potential financial distress – whether indicated by changes in payment behaviour or fluctuations in share price. It actively monitors our supply chain partners for corruption and fraud risks, including sanctions and bribery, as well as external threats such as natural disasters and political instability. Any detection of human rights violations within our supply chain triggers immediate review, following the process described below under ‘Audits and remediation’. The system currently assesses all our key Tier I suppliers and some Tier II suppliers.

Supplier assessment

Through the Sedex SAQ, suppliers identified as having the potential to conflict with our Code of Conduct are expected to complete a Sedex Members Ethical Trade Audit (SMETA). SMETA audits are typically on-site, announced audits organised by the supplier through an internationally recognised audit body as described [here](#). We operate processes that are designed to facilitate corrective actions after SMETAs, to ensure suppliers are engaged promptly when a risk event occurs and that these events are tracked through re-audits until satisfactory closure of the potential risk. These audits are valuable for enabling improvement, as shown when suppliers strengthen employee protections and welfare practices. For example, one of our suppliers in China changed its payment practices following a SMETA audit.

To drive broader sustainability improvements through our supply chain, we also require our key suppliers to complete an EcoVadis assessment with the expectation that they score above our minimum accepted threshold (‘Committed’/45). Key suppliers are those with whom we have high spend, strong levels of collaboration and are involved in driving innovation projects with Convatec. EcoVadis assessments score environmental practices, labour and human rights, ethics, and sustainable procurement; therefore, these assessments also help us identify potential risk further in the supply chain, based on their supplier relationship practices. At the end of 2025, 91% of our key suppliers have scored at least 45 on EcoVadis, with an average score of 64. Across our key suppliers assessed on EcoVadis there was an average 8% improvement compared with their previous EcoVadis assessment.

Any key supplier scoring below ‘Committed’ has 12 months to implement corrective actions on their EcoVadis assessment and undergo re-assessment. If they remain below ‘Committed’, they are required to complete a Sedex SMETA. We are currently engaging with these suppliers in 2026 and will escalate any non-conformance to senior management and the Human Rights Committee if needed, as described in the section ‘Audits and remediation’ below. The Human Rights Committee will then dictate the necessary response by Convatec, whether this be to terminate suppliers, subject suppliers to a corrective actions plan, or otherwise. Our process of reviewing scorecards and driving corrective actions through EcoVadis enables suppliers to improve their own performance and supply chain practices. Further detail on the scoring can be [viewed here](#).

We require that new suppliers agree to adhere to our Third-Party Compliance Manual, or demonstrate adherence to the principles stated therein, which may derive from their own codes of conduct. We include an assessment of potential new suppliers’ ability to participate in the EcoVadis assessment or Sedex process as part of our new sourcing process. This assessment is

part of the Request for Information (RFI) and Request for Proposal (RFP) phases. In order to supply Convatec, all new suppliers must specify whether they have already been assessed by EcoVadis and Sedex, or are willing to do so. The RFP process encourages all suppliers that we potentially do business with to assess their own sustainability performance, focussing on labour standards.

Supplier agreements

From a contracting standpoint, we require our suppliers to comply with the laws of the country in which they operate, including any anti-modern slavery and human trafficking legislation to which such supplier is subject. In the event that Convatec discovers any non-compliance by a supplier with such standards, therefore, Convatec has the option to terminate arrangements and remove such supplier from its supply chain.

As described in the previous section on our policies, each third party that goes through our due diligence process are required to attest to Convatec's Global Third-Party Manual, which outlines our Anti-Bribery and Anti-Corruption standards. Suppliers must certify their understanding of and commitment to comply with these requirements before receiving approval to become a new supplier. Our Manual addresses issues of human rights and the prohibition of child labour, compulsory labour and human trafficking. Suppliers with whom we contract through the term of our purchase order terms and conditions are subject to the Manual and other requirements, as referenced in Purchase Order T&Cs available on our website [here](#).

Audits and remediation

In accordance with the terms of our Manual, we are entitled to perform various types of audit assessments to verify the current state of supplier compliance and undertake routine monitoring of the supplier's on-going compliance. If a supplier fails to comply with our Manual, we can either put in place a remediation plan or, in cases of severe non-compliance, refuse to pursue or terminate an existing relationship and alert relevant local parties or authorities to facilitate remediation of impacts.

At the end of 2025, these processes did not reveal any issues that warranted an onsite audit focused on trafficking and modern slavery to be conducted.

In 2025 we continued our work with Sedex to obtain additional information on suppliers identified as high risk of modern slavery by EcoVadis IQ. Based on their SAQ, those identified as having a potential conflict with our Code of Conduct, as well as suppliers who do not complete the SAQ within required timescales are expected to complete a Sedex Members Ethical Trade Audit (SMETA). Nine (9) of our suppliers completed SMETA in 2025, resulting in successful closure of 65 corrective actions.

Convatec's category managers regularly conduct on-site visits with suppliers. If that category manager, based on their training and in line with our policies and procedures as outlined above, flags a potential human rights or labour issue during a visit, the supplier may be asked to complete a self-assessment, then, if necessary, a formal audit.

If suppliers refuse audits, or do not close non-compliances, Convatec completes a non-compliant supplier review form. This form is elevated for review by the VP of Supply Chain or VP Global Procurement, and Human Rights Committee and General Counsel for a final decision, including exit strategy if required. This process is detailed in our Sustainable Procurement Policy.

Open communication and whistleblowing/speaking-up

For colleagues, we are committed to fostering a work environment where open, honest communications are the expectation, not the exception. We encourage our employees to approach their manager, Human Resources, Legal, or Compliance in instances where they believe violations of policies or standards may have occurred, including in relation to trafficking or slavery issues. We also encourage them to ask if they require guidance about any of our policies and procedures.

We encourage all our employees and stakeholders to 'speak up', in situations where either employees or any third-party prefers to place a report in confidence. We provide access to an

independent Compliance Helpline, hosted by a third- party provider. This Compliance Helpline (Speak up) is available internally and on our website. Where there may be restrictions on confidential or anonymous employee reporting, employees are also directed to an internal confidential Convatec resource to help review and resolve any reports of concern. This includes issues relating to trafficking and slavery.

Training

Convatec provides mandatory training in relation to our Code for all new and existing employees (including all PLC Board members) on an annual basis. This training is delivered through online training, via Townhall meetings and in virtual or face-to-face sessions. As part of our management induction process, new members of our management team participate in training in relation to our Policy.

To hold ourselves accountable to monitoring and tracking this requirement, we maintain a target of ensuring that at least 95% of employees are successfully trained on our Code annually. We achieved that target in 2025 with 99% completion. Non-compliance is addressed through our standard performance management and compliance processes.

In 2025, we also set a target that at least 95% of employees are trained on human rights annually, via a mandatory e-learning module. In 2025, we reached a completion rate of 86% and have shaped plans to increase the completion rate in 2026. The interactive module guides all employees through important subjects such as human trafficking prevention, speaking up and environmental issues.

Category managers within our Procurement function are regularly trained through internal meetings focused on sustainability topics, labour rights and modern slavery prevention. Category managers are important for developing relationships with suppliers, communicating expectations clearly, and noticing possible breaches during site visits.

Effectiveness

The world is dynamic, and we face evolving variables that affect risk factors for modern slavery. In 2025, Convatec's Board of Directors reviewed and adjusted Convatec's risk profile to reflect sustained pressures across our operational value chain and the potential commercial effects of ongoing global economic challenge. We continue to monitor the overall risk profile of the company as a result of various global factors, and manage the challenges facing the business as we build further resilience into our operations. The Board was able to assess the prospects, liquidity, resilience and viability of the Group by considering principal risk led severe but plausible scenarios that took these factors into consideration.

Our approach to human rights within our own operations and within our supply chain is assessed regularly by one of our key customers, the UK National Health Service (NHS), using its Labour Standards Assurance System which outlines the principles and guidelines the NHS requires its suppliers to comply with to ensure good labour standards are driven throughout its supply chain. Assessments relate to particular product category tenders and cover all the aspects of a management system approach to human rights, including topics such as roles and responsibilities, policy, communication and awareness, risk assessment, operational control and training.

Overall, based on our business structure, due diligence process, and output from our third-party Risk Methods tool, we believe the risk of slavery and trafficking in our operations to be low and well managed. We believe our policies, training and procedures are effective in reducing the risk. During 2025, we did not receive any reports of these activities.

In relation to our supply chains, the audit assessment processes we operate have not revealed any issues that warrant an onsite audit focused on trafficking and modern slavery to be conducted. As highlighted above, we are taking steps to further expand our existing third-party-led supplier assessment processes and have set a committed target against which we can measure our success. We have not received any reports of slavery or people trafficking in our supply chain during 2025.

To further strengthen effectiveness, the Human Rights Committee intends to:

- Increase number of key indirect suppliers assessed through due diligence and risk assessment tools, including our advanced risk profiling tool for additional checks and real-time alerts
- Continue to expand the scope of our audit arrangements
- Standardise contracting terms related to our expectations around human rights and labour standards (for contractual/non-PO suppliers)

Summary of action

- Convened cross-functional Human Rights Committee, under the oversight of our executive-level ESG Steering Committee
- Maintained awareness of our Human Rights and Labour Standards Policy, including through mandatory Human Rights e-learning module
- Set clear expectations of suppliers through our Sustainable Procurement Policy and updated Supplier T&C's
- Integrated the use of third-party risk assessments for human and labour rights in the supply chain, including use of advanced risk profiling tool for real-time alerts
- Began mapping and assessing Tier II suppliers
- Trained procurement category managers on labour rights and modern slavery risks
- Progressed towards our target of 100% key suppliers assessed on EcoVadis by 2026, with 96% completed and an average score of 64 (our minimum requirement: 45; see page 5)

This statement has been approved by the Board of Directors of Convatec Group Plc on 26 June 2026 and is signed by the director responsible for ensuring compliance with the Modern Slavery Act 2015.



Jonny Mason
Chief Executive Officer

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