

Modern Slavery Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. Europlaz Technologies Ltd have a zero-tolerance approach to modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Statement

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a slavery and Human Trafficking statement each year.

We do not have an annual Turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

The Modern Slavery Act specifically states that any statement must include "the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business". We cannot guarantee that the entire supply chain is slavery free and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate these.

Organisational Information

Our Supply Chain and Procurement

Europlaz Technologies Ltd are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners. It's operated within a complex and highly regulated supply chain tailored to the medical device industry. The company sources raw materials, components, and specialised services from a network of 226 suppliers, with the vast majority based in the UK, Europe, and North America. Only three suppliers are located outside these regions.

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When procuring goods or services we have processes in place to consider Modern Slavery Risks. We ensure we carry out supplier due diligence.

- Robust Supplier Selection and Policies
- Supplier questionnaire
- Mapping of the supply chain to identify geographical areas of higher risk Requiring high risk suppliers, as part of the contract, to adhere to modern slavery policies and principles.
- Auditing and site visits where appropriate

We require our suppliers to confirm adherence to/or have a Supplier Code of Conduct in place, which covers Ethical Trading, Human Rights and Labour Standards. The organisation recognises that certain procurement practices can place undue pressure on suppliers, potentially increasing the risk of modern slavery. To mitigate this, it is committed to fair, transparent, and responsible sourcing practices that support ethical labour conditions and sustainable supply chains.

Areas of risk identified within the business and supply chain

We have recently carried out a risk assessment of our 226 approved suppliers. We identified 1 medium risk supplier due to risk markers of vulnerability and prevalence, as well as an industry marker for manufactures. Out of the 226 suppliers 130 are manufacturers, however 99% of our suppliers are based in countries with strong regulatory requirements around Modern Slavery.

Supplier Risk Assessment:

- The risk level is determined using the scale according to the global slavery index.
<https://www.globalslaveryindex.org>
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour.
- <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
- Then the sector is checked against the [ILO's Global Estimates of Modern Slavery](#)

We have the following policies in place to support our Modern Slavery process to identify and mitigate identified risks.

- Supplier Code of Conduct
- Ethical Trading, Human Rights and Labour Standards
- Whistleblowing

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

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Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

1. The number of modern slavery cases identified and remediated
2. Update of the Modern Slavery Statement and completion of the MSAT yearly
3. Number of medium or high-risk suppliers completing our supplier self-assessment audit with the inclusion of modern slavery questions
4. Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

Training

Training on our Modern Slavery Statement is provided at induction stage. As we identify more risk levels within our supply chain, through annual audit we will ensure that our training is proportionate for our staff to be able to consider modern slavery risks in procurement and be better equipped to undertake modern slavery due diligence for the organisation.

Reporting

If a case of Modern Slavery is suspected, then the following is advised.

A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life, then call local emergency (e.g. 911 in the US, 112 in Europe, 999 in the UK).

If there is no immediate risk to life, then contact the national helpline or report it online.

Helplines and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://www.europeanfreedomnetwork.org/hotline/	
UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager.

If there are concerns around modern slavery with any of our suppliers, we will first look to work with them to remedy the situation with an improvement action plan implemented and auditing of the organisation.



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If the response from any of our suppliers, here in the UK or abroad, seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected abroad, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions would then be included in the next statement produced.

Breaches

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers, individuals or organisations working with us, or on our behalf who breach this policy may have their relationship or contract with us terminated.

Review and Communication

This statement will be reviewed by the board and signed by a director or equivalent and then published on our website, and also uploaded to the following register:

<https://modern-slavery-statement-registry.service.gov.uk>

Signed:

Date: 27th Feb 2025

Print Name: Rory O'Keeffe

Position: Commercial Director