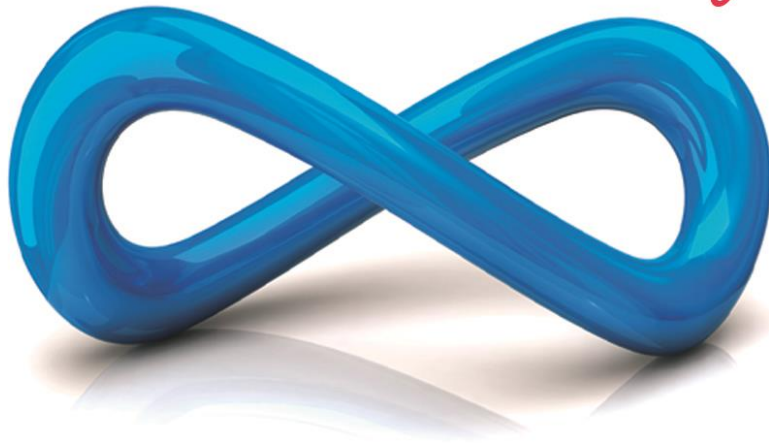


# MODERN SLAVERY STATEMENT

**iMEDicare**  
*Pelvic Health Naturally...*



# **iMEDicare LTD**

## **Modern Slavery Statement**

### **(under UK Modern Slavery Act 2015)**

*Published for the financial year ending 31<sup>st</sup> October 2024*

#### **Introduction**

iMEDicare LTD is medical devices distribution company based in England that provides medical device solutions to address the evolving needs of patients in the UK and Ireland with the problems of sexual dysfunction or urinary incontinence. Our purpose is to source innovative device solutions from around the globe within the remit of “Pelvic Health Naturally” – to import these medically licenced products from reputable suppliers to ensure they are available to the good citizens of the UK and Ireland to assist in the better management of their specific pelvic health concern. Building trust with our stakeholders is critical to our ability to deliver on our purpose, as well as our long-term financial performance. We have set a clear strategic path that we believe will further accelerate our journey in this respect. Our “*Corporate Responsibility*” (CR) strategy and “*Ethical and Labour Standard’s Policy*” (ELSP) is endorsed and ingrained at the highest level in our company. It is central to how we want to run our business. We focus our CR and ELSP work in four key areas: holding ourselves to the highest ethical standards; being part of the solution on pricing and access to medicines; helping tackle Regional health challenges; and being a responsible citizen. We also recognize that achieving our business goals requires that we operate with integrity, transparency and environmental sustainability. As a company that strives to be a responsible citizen, we are committed to conducting our business in a manner that respects the rights and dignity of all people that may be affected by our business activities. This means that the duty to “do no harm” to human rights is at the foundation of our purpose. We must avoid causing, contributing to or being directly linked to human rights violations, and promptly address any adverse human rights impact that we do identify in our own operations or in our supply chain. Research and development are at the core of our company, scientists, physicians and business professionals worldwide are focused on finding innovative solutions and bringing them to patients.

#### **Policies in relation to slavery and human trafficking**

##### *External References*

We respect and support the protection of human rights, as enshrined in the UN’s Universal Declaration of Human Rights (UDHR), proclaimed by the General Assembly of the United Nations on December 10, 1948. We are committed to upholding the core labour standards set out by the International Labour Organization (ILO).

We commit to abide by the UN Guiding Principles on Business and Human Rights and ensure appropriate implementation within iMEDicare LTD operations and supply chains.

iMEDicare LTD acknowledges its obligation to comply with the UK Modern Slavery Act 2015, established for the purposes of eliminating modern forms of slavery, including human trafficking, and forced labour. We acknowledge the importance of companies working together to tackle such issues in the UK and around the world, and we are actively monitoring similar legal requirements in other countries.

##### *Internal References*

Respect for, and support for the protection of human rights is relevant to all aspects of our business, from research and development and clinical trials to the way we commercialize our medical devices. The general obligation of each iMEDicare employee to respect human rights is defined in the iMEDicare Code of Conduct. Our Corporate Responsibility Guideline provides overall guidance on governance, roles and responsibilities, and management of corporate responsibility across iMEDicare LTD. Human Rights topics are governed and managed by issue- and function-specific standards at iMEDicare, including the iMEDicare Third Party Code, fair working conditions, professional practices, and responsible supply chain management.

We follow an integrated approach to managing human rights and environmental protection and have several processes in place that aim to avoid human rights- related violations, such

as:

### **Third Party Risk Management (TPRM)**

The revised iMEDicare “Third Party Code” defines the principles and standards that iMEDicare requires compliance with by its suppliers in the areas of labour rights, health and safety, environmental protection, animal welfare, anti-bribery, data privacy and conflict minerals. The Code is based on the UN Global Compact and other international standards or accepted good practices.

In particular, our Third Party Code:

- Requires Adherence to local and national laws
- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime
- Prohibits child labour
- Prohibits discrimination

### **Human Resources**

iMEDicare policies regarding labour rights and working conditions, including those related to recruitment, hiring, discharge, promotion and training, prohibit discrimination on universally accepted grounds. iMEDicare is committed to treat all associates with fairness and respect. Any form of discrimination or harassment based on personal characteristics such as nationality, gender, age, ethnicity, religion, sexual orientation, disability, membership of an association or any other subject protected by law, will not be tolerated. Our policies require that corrective action be taken where prohibited practices are identified.

The Human Resource (HR) Principles Guideline outlines how the iMEDicare Human Resources function supports the company's strategic goals, including a commitment to fair and respectful treatment of associates, and their development through processes, services, and tools.

### **Due diligence processes and grievance mechanism in relation to slavery and human trafficking**

iMEDicare requires associates to report actual or suspected violations of our Code of Conduct. However, fear of retaliation can make it hard for people to do this, so we enforce clear policies to protect them from any potential retaliation that might result from doing the right thing.

Complaints can be made by email, in person, and telephone.

We continue to work with all suppliers to raise awareness of legislation related to modern slavery and emphasize our company’s commitment to strive to prevent modern slavery in our operations and supply chain. During our Third Party Risk Management on-boarding process, prospective suppliers are required to complete a questionnaire based on preliminarily flagged risks, which enables us to map, review and address risk in our supply chain throughout the world.

### **Risk areas for slavery and human trafficking**

We have not identified any actual modern slavery incidents in our supply chain. We continue to monitor the situation to ensure that any third-party supplied material used in our products are forced-labour-free.

### **iMEDicare supply chain and procurement**

To maintain a responsible supply chain, we focus our attention on risk and responsibility. Expectations are addressed in the early stages of the supplier selection process. We engage with an extensive network of suppliers worldwide and their contributions are crucial to our success.

Our responsibility goes beyond monitoring suppliers’ ability to comply with standards, to

promoting real changes that benefit workers and the environment in the countries we source from. Whenever a supplier is identified with a potential labour rights risk (e.g. potential infringement of the right to freedom of association and collective bargaining, or forced or compulsory labour), the topic is discussed with the supplier. If an issue surfaces, we address it

by engaging with the supplier and developing an improvement plan together. Our process to identify and monitor suppliers considered to have significant risk for incidents of child labour or young workers exposed to hazardous work is also embedded in our TPRM program.

### **iMEDicare clinical trial approach**

At iMEDicare, we follow one global ethical standard for conducting clinical trials regardless of geography. All clinical trials are designed, conducted and reported in accordance with the ethical principles embodied in the Declaration of Helsinki, Good Clinical Practice guidelines and national and international regulatory requirements. We apply the same Good Clinical Practice standards for protocols, informed consent documents and ethical reviews in all countries where we conduct clinical trials. When recruiting participants, researchers strive to ensure that no discrimination arises based on economic, gender and/or ethnic factors, while respecting cultural sensitivities and the requirements of the relevant study protocol. Special care is taken when recruiting trial participants from vulnerable populations, such as children or the economically deprived. Prior to the start of a study all appropriate trial documentation must be reviewed and positively assessed by independent and appropriately constituted ethics committees and, where required, by the relevant health authorities.

Practices in the developing world are frequently scrutinized to help ensure they are not used to escape regulations or ethical standards in Europe or the US. iMEDicare acknowledges that the situation of clinical study participants in developing nations is more complex than in the developed world. iMEDicare is globally committed to the highest possible standards for the protection of all study participants and to a single set of core principles that governs all studies sponsored by iMEDicare.

### **Training**

We promote respect and support for the protection of the rights defined in the International Bill of Human Rights.

We continue to invest in trainings for our associates (including members of the Executive Committee), which reference human rights.

E-trainings target associates with an email address. All remaining associates are required to be trained face-to-face or through shared kiosks.

Training on the Responsible Procurement process includes risk assessment for labour rights and is conducted as part of the onboarding training for procurement associates involved with supplier qualification processes.

### **Conclusion**

Slavery and human trafficking are serious crimes and a violation of the fundamental dignity of the human being. iMEDicare is pleased to submit this statement outlining our aspirations and objectives and the processes we have in place today that can help identify and eliminate slavery and human trafficking. We are committed to further advance our efforts in these areas in the coming years.

Darren Breen – Managing Director

iMEDicare LTD