TERRAMED LIMITED – MODERN SLAVERY POLICY

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1. Introduction and Policy Commitment

TerraMed Limited ("TerraMed", "we", "us" or "our") is committed to conducting business ethically, responsibly and with respect for internationally recognised human rights.

We maintain a zero-tolerance approach to modern slavery, human trafficking, forced labour, servitude and all forms of exploitation within our operations and supply chains.

Modern slavery constitutes a serious violation of fundamental human rights and includes practices through which individuals are exploited by means of coercion, threats, deception, abuse of vulnerability or restrictions on personal freedom.

This Policy Statement establishes TerraMed's approach to preventing, identifying, addressing and mitigating modern slavery risks throughout its business activities and commercial relationships.

Our commitments are informed by the Modern Slavery Act 2015, the principles of the International Labour Organisation (ILO), the United Nations Guiding Principles on Business and Human Rights and relevant UK public procurement requirements.

Although TerraMed publishes this statement voluntarily, we recognise the importance of transparency, accountability and continuous improvement in managing supply chain risks.

We expect our employees, directors, contractors, suppliers, manufacturers, distributors and other business partners to uphold equivalent standards and actively contribute to preventing exploitation.

2. Our Business and Supply Chain

TerraMed Limited is a UK-based distributor of medical devices, medical disposables, healthcare consumables and related products supplied to NHS organisations, private healthcare providers and other customers.

TerraMed is not a manufacturer. Our business activities principally involve sourcing products from manufacturing partners, managing supplier relationships, coordinating procurement and distribution, and supplying healthcare products to customers.

Our supply chain may involve:

- Manufacturers of medical devices and consumables.
- Suppliers of medical-grade materials, packaging and associated components.
- Importers, distributors and commercial intermediaries.
- Warehousing, freight, transportation and logistics providers.
- Professional, administrative and outsourced service providers.

We recognise that supply chains may extend beyond our direct contractual partners to include raw material suppliers, subcontracted manufacturers, recruitment agencies and other upstream organisations.

While TerraMed does not directly control the employment practices of independent manufacturers or their subcontractors, we seek to exercise appropriate commercial influence through supplier selection, contractual expectations, due diligence, monitoring and corrective action.

We recognise that product quality certifications and regulatory conformity markings, including ISO certifications and CE or UKCA marking, do not independently establish compliance with labour and human rights standards.

Accordingly, we consider ethical sourcing and modern slavery risk management separately from product quality and regulatory compliance.

3. Scope and Application

This Policy applies to:

- Directors, officers, employees and temporary workers of TerraMed.
- Contractors, consultants, agents and representatives acting on our behalf.
- Manufacturers, suppliers, distributors and other business partners providing goods or services to TerraMed.
- Relevant subcontractors and other organisations participating in our supply chain.

All individuals and organisations within scope are expected to comply with applicable legislation and uphold the principles contained in this Policy.

Suppliers must take reasonable, risk-proportionate steps to communicate and implement equivalent standards throughout their own supply chains.

Where applicable laws impose more stringent requirements than this Policy, the higher legal standard shall prevail.

4. Fundamental Labour and Human Rights Standards

TerraMed requires its suppliers and business partners to respect the following principles.

4.1. Prohibition of Forced and Compulsory Labour

All employment must be freely chosen.

Forced, bonded, indentured, trafficked or compulsory labour is prohibited, including situations involving threats, intimidation, debt bondage, coercion or the abuse of vulnerability.

Workers must not be compelled to remain in employment through unlawful financial penalties, threats, physical restrictions or other coercive measures.

4.2. Freedom of Movement and Employment

Workers must retain freedom of movement and the right to leave employment in accordance with applicable laws and reasonable contractual notice requirements.

Employers must not unlawfully restrict workers' movement, accommodation arrangements or access to personal belongings.

4.3. Prohibition of Recruitment Fees

Workers must not be required to pay recruitment fees or related costs as a condition of obtaining or retaining employment.

Suppliers must take reasonable steps to ensure that recruitment agencies and labour intermediaries comply with this principle.

Where prohibited recruitment fees are identified, appropriate remediation should include arrangements for reimbursement to affected workers.

4.4. Protection of Identity Documents

Workers must retain possession and control of their passports, identity documents, immigration documents and other personal records.

Such documents must not be confiscated, unlawfully withheld or used to restrict workers' freedom.

Any safekeeping arrangements must be genuinely voluntary and permit workers to retrieve their documents promptly.

4.5. Prohibition of Child Labour

TerraMed prohibits unlawful child labour and the exploitation of children.

Suppliers must comply with applicable minimum working age requirements and relevant ILO standards.

No person under the age of 18 may be employed in hazardous work or other activities prohibited for young workers under applicable law.

Where child labour is identified, corrective measures must prioritise the child's welfare, education and protection rather than simply terminating employment without appropriate safeguards.

4.6. Fair Wages and Working Hours

Workers must receive wages, benefits and working conditions that comply with applicable employment legislation and contractual requirements.

Wages must be paid accurately and on time, with no unlawful deductions or withholding.

Working hours, overtime, rest periods and leave must comply with applicable laws.

Overtime must not be imposed through coercion, threats or unlawful penalties.

4.7. Freedom of Association

Workers must be permitted to exercise their lawful rights to freedom of association, collective bargaining and worker representation.

No worker should face retaliation, intimidation or discrimination for exercising these rights.

4.8. Dignity, Equality and Non-Discrimination

All workers must be treated with dignity and respect.

Physical abuse, threats, sexual harassment, bullying, degrading treatment and other forms of intimidation are prohibited.

Suppliers must comply with applicable equality and employment laws and maintain fair recruitment, employment and disciplinary practices.

4.9. Safe Working Conditions

Suppliers must provide working environments that comply with applicable occupational health and safety legislation.

Appropriate risk assessments, protective equipment, worker training, emergency procedures and safeguards must be maintained.

Where accommodation is provided by employers or labour intermediaries, living conditions must be safe, hygienic and consistent with applicable legal standards.

4.10. Access to Remedy and Justice

Individuals affected by exploitation must have access to appropriate reporting mechanisms, support and remediation.

Suppliers must not retaliate against workers who raise concerns, cooperate with investigations or seek assistance from competent authorities.

5. Supplier Standards and Due Diligence

TerraMed expects suppliers and manufacturing partners to demonstrate responsible employment practices and take proportionate steps to identify and manage modern slavery risks.

Our supplier due diligence approach is based on the nature of the products or services provided, the structure of the supply chain and the relative level of risk.

5.1. Supplier Selection and Assessment

When selecting or reviewing suppliers, TerraMed may consider:

- The supplier's location and operating environment.
- The nature of manufacturing activities and associated labour requirements.
- The use of recruitment agencies, temporary workers or migrant labour.
- The supplier's policies on forced labour, child labour and human trafficking.
- Relevant third-party certifications, independent assessments or ethical audit findings.
- The transparency and traceability of the supplier's manufacturing and sourcing arrangements.
- Previous allegations, regulatory findings or other credible indicators of labour exploitation.
- The supplier's willingness to cooperate with reasonable due diligence enquiries.

Suppliers may be required to provide relevant policies, declarations, assessment results, corrective action records or other evidence demonstrating their approach to ethical employment.

5.2. Supplier Code of Conduct

TERRAMED LIMITED
Suite 7, Innovation House, Molly Millars Close, Wokingham, Berkshire, RG41 2RX

Our Supplier Code of Conduct establishes the ethical, professional, labour, environmental and regulatory standards expected of organisations supplying TerraMed.

We expect manufacturing partners and other relevant suppliers to uphold its principles and communicate equivalent standards to their subcontractors and upstream suppliers.

5.3. Manufacturing Partners

As a distributor, TerraMed recognises the importance of selecting manufacturing partners that maintain appropriate product quality systems and responsible labour practices.

Our approach includes seeking appropriate assurances regarding:

- Compliance with applicable employment and human rights legislation.
- The absence of forced, trafficked or unlawful child labour.
- Responsible recruitment and employment arrangements.
- Safe working conditions and fair treatment of workers.
- Transparency concerning subcontracted manufacturing activities.
- Appropriate mechanisms for identifying and correcting non-compliance.

We may request additional information or undertake enhanced assessments where circumstances indicate increased risk.

5.4. Supplier Audits and Site Assessments

TerraMed may use supplier questionnaires, document reviews, third-party assessments, independent audits or manufacturing site visits as part of its due diligence arrangements.

The frequency and scope of assessments will be determined by relevant risks, commercial arrangements, available resources and the nature of the products supplied.

Where appropriate, we may request independent audit reports or arrange site visits to assess relevant working conditions and ethical practices.

Any concerns identified through these activities will be assessed and addressed through proportionate corrective measures.

5.5. Subcontractors and Upstream Supply Chains

Suppliers must take reasonable steps to identify modern slavery risks associated with relevant subcontractors, labour intermediaries and upstream manufacturing arrangements.

Where material risks are identified, suppliers are expected to implement appropriate mitigation measures and communicate significant concerns affecting TerraMed.

We encourage supply chain transparency and collaborative improvement rather than reliance solely on contractual assurances.

6. Risk Assessment and Management

TerraMed recognises that modern slavery risks may exist within healthcare manufacturing and distribution supply chains, particularly where operations involve complex sourcing arrangements, labour-intensive production or vulnerable workers.

Potential risk factors include:

- Manufacturing activities in jurisdictions with elevated labour exploitation risks.
- Limited visibility over subcontracted production and raw material sourcing.
- The use of migrant, temporary or agency workers.
- Recruitment arrangements involving third-party intermediaries.
- Excessive overtime, low wages or unsafe working conditions.
- Excessive commercial pressure arising from pricing or delivery requirements.
- Inadequate employment documentation or ineffective worker grievance procedures.
- Logistics, warehousing and other outsourced labour-intensive services.

We aim to prioritise due diligence activities according to the likelihood and potential severity of adverse impacts.

Where risks cannot be eliminated immediately, we seek to establish proportionate mitigation measures, obtain additional assurances and monitor progress.

In assessing risk, we recognise that the absence of reported incidents does not necessarily demonstrate the absence of exploitation.

7. Ethical Purchasing and Responsible Procurement

TerraMed recognises that purchasing practices can influence working conditions throughout the supply chain.

Commercial decisions involving pricing, production schedules, order volumes and contract terms can create pressures that increase the risk of labour exploitation.

We therefore seek to conduct procurement activities in a manner that supports responsible manufacturing and sustainable business relationships.

Our principles include:

7.1. Responsible Pricing

We aim to negotiate commercially reasonable prices without knowingly creating unsustainable pressures that encourage unlawful or exploitative labour practices.

7.2. Realistic Delivery Requirements

We seek to establish achievable production and delivery schedules, recognising that unrealistic deadlines can contribute to excessive working hours and unsafe conditions.

7.3. Advance Planning and Forecasting

Where practicable, we provide suppliers with reasonable notice of material purchasing requirements and changes in demand.

7.4. Responsible Order Management

We aim to minimise avoidable last-minute changes, cancellations or demands that could adversely affect workers or production conditions.

7.5. Timely Payment Practices

We seek to honour agreed payment terms and maintain responsible financial relationships with our suppliers.

7.6. Fair Contractual Arrangements

We aim to apply reasonable contractual requirements and avoid disproportionate penalties or commercial practices that could encourage unethical cost reduction.

7.7. Clear Technical Specifications

We seek to communicate product specifications and quality requirements accurately, allowing manufacturers to plan production safely and responsibly.

7.8. Collaborative Supplier Relationships

We encourage open communication with manufacturing partners regarding operational challenges, labour standards and opportunities for improvement.

These principles support our commitment to ethical procurement while maintaining necessary standards of product safety, quality and commercial accountability.

8. NHS and Public-Sector Procurement

As a supplier to the UK healthcare sector, TerraMed recognises the importance of responsible sourcing and transparent supply chain management within NHS procurement.

We acknowledge the requirements and expectations established by applicable public procurement legislation and relevant NHS procurement standards, including:

- The Modern Slavery Act 2015.
- The Procurement Act 2023.
- The National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2025.
- Applicable government procurement policy and guidance concerning modern slavery in supply chains.
- Relevant NHS Supply Chain supplier requirements and contractual obligations.

We are committed to cooperating with proportionate supplier due diligence processes, providing relevant documentation and responding to reasonable requests for information regarding ethical sourcing and labour practices.

Where required by applicable procurement arrangements, this may include completion and periodic updating of the Modern Slavery Assessment Tool (MSAT), participation in risk assessments and implementation of appropriate improvement measures.

We recognise that compliance with healthcare product regulations and quality standards does not eliminate the need for independent consideration of labour and human rights risks.

9. Governance and Responsibility

Overall responsibility for the implementation and oversight of this Policy rests with TerraMed's directors and senior management.

Management is responsible for:

- Promoting responsible business conduct and ethical sourcing.
- Integrating modern slavery considerations into relevant procurement and supplier management activities.
- Assessing and escalating material risks and concerns.
- Ensuring that appropriate corrective action is considered where non-compliance is identified.
- Reviewing the effectiveness of relevant policies and procedures.
- Supporting cooperation with customers, regulatory bodies and other relevant stakeholders.

Employees involved in procurement, supplier management, commercial operations and compliance are expected to remain alert to indicators of exploitation and report credible concerns promptly.

Suppliers and business partners retain responsibility for their own employment practices and for implementing appropriate safeguards within their operations.

10. Training, Communication and Awareness

TerraMed recognises that awareness and appropriate training contribute to the prevention and detection of modern slavery.

We seek to ensure that individuals with relevant responsibilities understand the principal risks associated with labour exploitation and ethical sourcing.

Training and awareness activities will be proportionate to individual roles and may include:

- Awareness of modern slavery and human trafficking indicators.
- Understanding supplier and manufacturing supply chain risks.
- Recognising potentially exploitative recruitment and employment practices.
- Understanding reporting and escalation procedures.
- Awareness of procurement-related obligations and ethical purchasing principles.
- Guidance on responding appropriately to suspected exploitation.

Relevant employees and business partners are expected to familiarise themselves with this Policy and the standards contained in the Supplier Code of Conduct.

We will review awareness and training needs periodically, taking account of changes in business activities, legislation and identified risks.

11. Reporting Concerns and Whistleblowing

Preventing and addressing modern slavery is a shared responsibility.

Employees, suppliers, contractors, customers and other stakeholders are encouraged to report any actual or suspected instances of forced labour, human trafficking, worker exploitation or other breaches of this Policy.

Concerns may be reported confidentially to: **management@terramed.co.uk**

Reports should contain relevant information that may assist in understanding and assessing the concern.

TerraMed will take reported concerns seriously and seek to ensure that they are handled appropriately, sensitively and without unnecessary delay.

We prohibit retaliation against individuals who raise genuine concerns in good faith or cooperate with legitimate investigations.

Where there is reason to believe that a person may be at immediate risk, appropriate protective measures and referrals to competent authorities should be prioritised.

Nothing in this Policy prevents individuals from reporting suspected criminal activity directly to law enforcement agencies or other appropriate authorities.

12. Investigation, Remediation and Corrective Action

Where credible allegations or evidence of modern slavery arise, TerraMed will assess the circumstances and determine appropriate action, taking account of the severity of the concerns, the available evidence and the potential consequences for affected individuals.

Responses may include:

- Seeking further information and clarification from relevant suppliers.
- Requesting supporting documentation or independent assessments.
- Requiring time-bound corrective action plans.
- Monitoring the implementation of agreed improvements.
- Escalating concerns to relevant authorities where appropriate.
- Suspending orders or business activities where necessary.
- Terminating commercial relationships in serious or unresolved cases.

Our approach will prioritise the safety, dignity and welfare of individuals who may have experienced exploitation.

Where appropriate and within our influence, we will seek to support remediation rather than automatically disengaging from a supplier in circumstances where abrupt termination could increase risks to vulnerable workers.

However, TerraMed reserves the right to take immediate protective action or terminate a business relationship where serious misconduct, continued non-compliance or unacceptable risks justify such measures, subject to applicable legal and contractual requirements.

13. Monitoring Effectiveness and Continuous Improvement

TerraMed recognises that addressing modern slavery risks requires ongoing attention, proportionate monitoring and continuous improvement.

We will seek to evaluate the effectiveness of our approach through relevant qualitative and quantitative indicators.

These may include:

- The proportion of relevant suppliers subject to appropriate due diligence.

- Supplier acknowledgement of ethical sourcing requirements.
- Completion and updating of relevant supplier risk assessments.
- Completion of applicable NHS procurement-related assessments.
- Modern slavery awareness and training activities.
- The number and nature of reported concerns.
- Corrective actions requested and their implementation status.
- Supplier reviews, audits and site assessments where undertaken.

These indicators will be assessed according to the scale of our operations and the risks associated with our supply chains.

We will seek to improve our understanding of upstream manufacturing arrangements, strengthen relevant supplier engagement and incorporate lessons learned from identified concerns.

We recognise that responsible supply chain management is an ongoing process and that no organisation can guarantee the complete absence of modern slavery throughout a complex international supply chain.

14. Policy Compliance and Breaches

Compliance with this Policy is expected of all relevant employees, representatives, contractors and business partners.

Breaches may result in appropriate action according to the nature and seriousness of the circumstances.

For employees, this may include disciplinary procedures, up to and including dismissal where justified under applicable employment law.

For external suppliers or business partners, consequences may include enhanced monitoring, corrective action requirements, suspension of orders or termination of contractual relationships.

Where conduct may constitute a criminal offence or serious regulatory breach, TerraMed may refer the matter to the appropriate authorities.

All actions will be considered in accordance with applicable laws, contractual arrangements and the need to safeguard potentially affected individuals.

15. Policy Review and Administration

This Policy forms part of TerraMed's commitment to responsible business conduct, human rights, ethical procurement and supply chain governance.

It should be read alongside other relevant company policies, including the Supplier Code of Conduct.

The Policy will be reviewed at least annually, and earlier where necessary to reflect material changes in:

- Applicable legislation or regulatory guidance.
- NHS and public-sector procurement requirements.
- TerraMed's business activities or supply chain arrangements.
- Identified modern slavery risks.
- Relevant industry standards and emerging good practice.

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Updates will be communicated where appropriate, and the current version will be made available through TerraMed's website.

16. Statement of Commitment

TerraMed Limited is committed to preventing modern slavery and human trafficking within its operations and supply chains.

As a distributor of healthcare products, we recognise our responsibility to exercise appropriate due diligence over our manufacturing and commercial relationships, promote ethical purchasing practices and respond responsibly to identified risks.

Our approach is based on respect for human rights, accountability, transparency, cooperation and continuous improvement.

We expect our suppliers and business partners to share these principles and to take appropriate action to prevent the exploitation of workers at every relevant stage of the supply chain.

Through responsible sourcing, proportionate risk management and sustained engagement with our business partners, TerraMed aims to contribute to a healthcare supply chain that is ethical, resilient and respectful of human dignity.

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