

1. Policy Statement

On behalf of Griffiths and Nielsen Ltd. and G&N Laboratory Ltd., this statement is made pursuant to section 54(1) of the Modern Slavery Act 2015

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, the use of child 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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

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, 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.

2. Organisation Structure and Supply Chains

Griffiths and Nielsen and G&N Laboratory are related companies, with Griffiths and Nielsen carrying out activities on behalf of G&N Laboratory under a Service Level Agreement. All procurement, regulatory, logistics and commercial functions are carried out from a HQ building in West Sussex, UK. Both companies operate primarily within the healthcare sector, Griffiths and Nielsen focussed on the supply of medical devices, G&N Laboratory on clinical waste solutions and laboratory consumables.

Griffiths and Nielsen and G&N Laboratory have global supply chains with direct influence and oversight of our Tier 1 suppliers. The companies' Primary suppliers of the companies are located in the UK, EU and China. The companies both distribute products designed by other manufacturers and use sub-contractors to manufacture products to their own specification.

3. Organisational Policies

The companies have policies in place in order to help it achieve the aims of this policy.

- Ethical Procurement Policy (ESOP-1)
- Corporate Social Responsibility
- Training and Development
- Control of Class 1 Suppliers (SOP-18)
- Control of Purchasing (SOP-16)

4. Due Diligence Processes

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers, making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance.

Our due diligence processes are designed to be proportionate to:

- the identified modern slavery risk
- the severity of the risk, and
- the level of influence a business may have

To ensure all those in our supply chain and contractors comply with our values, we have in place a standard clause in all our new agreements with suppliers and contractors which informs them of our commitment to combatting slavery and human trafficking and requires them to agree to this commitment when working with us.

We are committed as a company to tackling modern slavery and human trafficking and want to work with suppliers who share this commitment

5. Assessment of Risk

The company assesses the risks of its business relationships taking into account of the factors that influence the risk of modern slavery occurring within the supply chain. Factors that can influence the level of risk in the companies' relationships can include:

Countries of operation: Legal protections for workers rights and the effective enforcement of them varies between countries and there is greater risk of modern slavery in countries with weaker protections.

Sector risks: The type and level of risk varies between sectors and the companies will tailor their approach to account for this.

Business Partnership Risks: The risks may differ based on the nature and duration of a relationship. The companies may have better knowledge of a long-standing partner's operations, but may not have had full due diligence conducted at the outset.

The directors of the company are responsible for the assessment of modern slavery risks with support from department heads.

6. Performance Indicators

The companies are committed to the use of metrics to assess the performance of the processes which support this policy. Monitoring and Review of this policy is the responsibility of the Managing Director.

7. Training

Training is an important part factor in the elimination of modern slavery. The companies ensure that all applicable staff receive training that is appropriate to their role.

8. Compliance with the Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or one of the contacts below as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or a director as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

9. Breaches of this Policy

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

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

10. Emergency Contacts

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Neil Conroy, Head of QA/RA (Griffiths and Nielsen Ltd.)

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11. Approval

Signed by:

Giles Griffiths, CEO

14th December 2023