

# Modern Slavery Statement



## Introduction

This statement sets out Intersurgical's actions in identifying all potential modern slavery risks related to its business, and to put measures in place that are aimed at ensuring that there is no slavery (including human trafficking) in its own business and its supply chains.

This statement is made in compliance with section 54 of the Modern Slavery Act 2015, however applies to all Intersurgical Group legal entities, and outlines our activities related to modern slavery prevention for the financial year from 1 January 2024 to 31 December 2024.

As a medical device manufacturer, Intersurgical recognises we have a responsibility to take a robust approach to slavery. We are committed to preventing modern slavery in all our activities, and ensuring that our operations and supply chains are free from modern slavery.

The due diligence measures in place to demonstrate this commitment are detailed below.

## Organisation's Structure

Intersurgical is a global designer, manufacturer and supplier of high quality medical devices for respiratory care and support within the healthcare sector. Our extensive product range covers the four areas of, Airway Management, Anaesthesia, Critical Care and Oxygen & Aerosol Therapy.

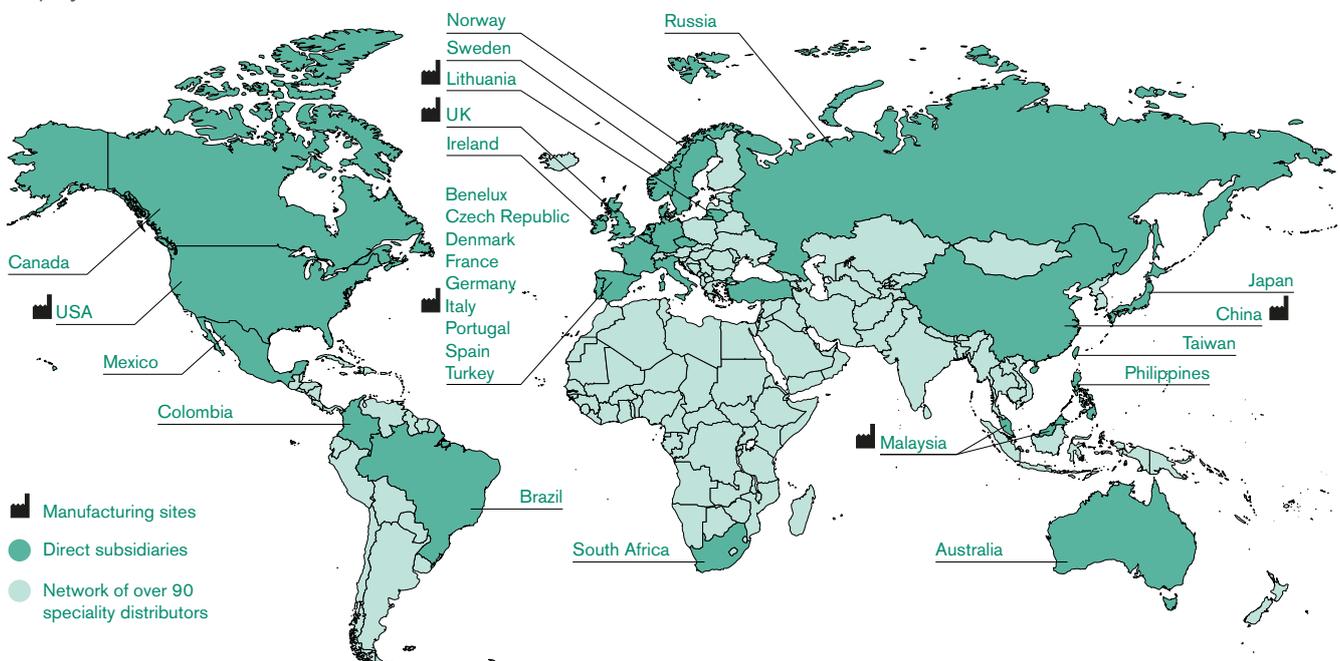
Intersurgical was formed in 1982 in Rugby, UK, with just seven employees producing a limited number of products for the UK market. Through a constant programme of new product and market development today we offer an extensive product range of over 3520 products, and employ over 3700 employees worldwide.

Although our production facilities initially begun in the UK, we now own and operate six international manufacturing sites in:

- Changzhou, China
- Mirandola, Italy
- Pabrade and Visaginas, Lithuania
- Penang, Malaysia
- Indianapolis, USA
- Wokingham, UK (Head Office)

In addition, we have subsidiary sales offices in the following 27 countries, and work with a number of distributors to support sales across other markets. Our Subsidiary Sales offices are:

- Matraville, Australia
- Sao Paulo, Brazil
- Ontario, Canada
- Changzhou, China
- Porto Sabana, Columbia
- Prague, Czech Republic
- Farum, Denmark
- Beaubourg, France
- Sankt Austin, Germany
- Dublin, Ireland
- Mirandola, Italy
- Tokyo, Japan
- Pabrade, Lithuania
- Penang, Malaysia
- Queretaro, Mexico
- Uden, Netherlands
- Moss, Norway
- Manila, Philippines
- Sintra, Portugal
- Sandton, South Africa
- Moscow, Russia
- Madrid, Spain
- Kista, Sweden
- Taichung, Taiwan
- Istanbul, Turkey
- Wokingham, UK (Head Office)
- Indianapolis & New York, USA



## Our Goal / Purpose

To deliver trusted solutions that enable exceptional patient care, in a work environment where our people can thrive. We are committed to being a respected healthcare partner driven by quality, innovation and environmental responsibility.

Driven by **Quality**, Defined by **Innovation**, Built on **Trust**.

We are committed to advancing our sustainability efforts by fostering an ethical, responsible culture that prioritises doing the right thing. This commitment extends to minimising our environmental impact, protecting human rights, and ensuring that no individual is exposed to modern slavery as a result of our operations.

We take a zero-tolerance approach to human trafficking, forced labour, debt bondage, and child slavery, and join the cause to prevent, detect and eliminate all forms of modern slavery.

## Risk Assessment

We are committed to identifying and mitigating the risks of modern slavery within our operations and supply chain.

We conduct annual risk assessments to evaluate the risk and likelihood of modern slavery occurring in our business activities, considering factors such as industry, geographic location, and supplier practices.

## Our Workforce

To prevent modern slavery within our own operations, we focus on establishing ethical recruitment practices, including transparent employment terms, fair wages, and clear, written contracts. Whenever possible, we hire directly, and in the unusual event we engage with agency support we ensure third-party labour providers are adequately vetted to reduce risks associated with indirect hiring, such as ensuring the recruitment fees are not paid by the worker, or other coercive practices.

Our commitment includes regular training for all employees and managers on modern slavery awareness, and reporting mechanisms, ensuring that our teams can identify and respond to any signs of exploitation.

We also prioritise employee support and well-being, offering access to Employee Assistance Programmes. Confidential grievance channels, supported by whistle-blower protections allow employees to report concerns without fear of retaliation.

We welcome employee feedback and foster a supportive and inclusive culture where every team member is valued and encouraged to contribute their ideas, thoughts, and opinions. Our open-door policy ensures that everyone's voice is heard and respected.

## Relevant policies

Intersurgical has a number of policies, procedures and processes which are aimed at helping us to identify and mitigate the risk of modern slavery.

- Whistleblowing policy: We encourage all our workers, customers and other business partners, including suppliers

to report any concerns related to the direct activities, or the supply chains of our organisation. This includes any circumstances that may give rise to an enhanced risk of modern slavery. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete our confidential whistleblowing disclosure form.

- Employee handbook / code of conduct: We have a code of conduct for employees in the form of a staff handbook which sets out our expectations of how all employees should behave along with their employment rights. This handbook also includes information on ethical business practices, grievance, whistleblowing, corporate social responsibility, diversity equality & inclusion, bullying & harassment, and health & safety.
- Recruitment & Training: Our recruitment and training policies are embedded within our Quality Management System. Our recruitment policy includes specific rules relating to modern slavery, including the prohibition of child labour, retention of right to work documentation, and the use of agencies.

In addition to these policies, all Employees are issued with a contract of employment setting out the terms relating to their employment. These contracts include confirmation of above minimum wage pay, the rights to terminate their employment, and rules on overtime.

## Training

Ensuring our teams are aware and trained on modern slavery is vital to ensuring our success in our goal of ensuring our operations and supply chains are free from modern slavery.

We require all staff in the UK, and those globally working in Management, Supply Chain and HR to complete training on our modern slavery and whistleblowing, to enable them to have the requirement understand to identify and promptly raise any concerns they may have.

## Awareness

To further support training on modern slavery, we recognise Anti-Slavery Awareness Day annually and use the opportunity to engage with our teams on the topic.

This serves as an opportunity to reinforce awareness, act as a reminder of the ongoing risks of modern slavery, and reconfirm our commitment to ethical labor practices. As part of this initiative, we highlight key principles of the Modern Slavery Act 2015, educate employees on how to identify and report concerns, and provide information on both internal reporting channels and external support helplines.

## Our Supply Chain

Our supply chain primarily consists of partners sourcing and providing raw materials and components to meet the requirements of our medical devices. Intersurgical is committed to the protection of human rights, and the prevention, detection and elimination of modern slavery within our own supply chain whilst operating ethically and with integrity.

As part of our commitment to identify and mitigate the risk of modern slavery in our supply chain we have the following measures in place:

- Procurement and Supplier procedures are embedded within our Quality Management System carefully describing the process for supplier selection, evaluation and audit.
- Regularly mapping the supply chain broadly to assess geographical risks of modern slavery using the Walk Free Global Slavery Index.
- We conduct new supplier assessments to evaluate and ensure their practices meet Intersurgical's requirements. This assessment provides a modern slavery risk grade which will help to guide corrective actions.
- Provide all suppliers with a supplier handbook/code of conduct setting clear expectations, outlining compliance requirements, and supporting due diligence efforts to prevent exploitation within the supply chain.
- Conduct regular reviews of supplier assessment in order to track the work they are doing to prevent, detect and eliminate modern slavery and capture any risks to changing geographical locations.
- We conduct supplier audits, prioritising high risk suppliers, to evaluate their management of modern slavery, and ensure their practices continue to meet Intersurgical's requirements.
- We have procedures in place to encourage all individuals within the supply chain to raise concerns and to ensure the protection of whistleblowers.
- Where necessary we will provide guidance on corrective actions, and training, to high risk suppliers.

Intersurgical will not support or deal with any business knowingly involved in modern slavery, and are delighted to report that following the steps above no instances of modern slavery have been highlighted.

### Remedy

Where a complaint related to modern slavery has been made via our whistleblowing procedure, Intersurgical will initiate a prompt investigation to understand the nature and extent of the alleged incident.

If the complaint is substantiated, immediate action will be taken to safeguard affected individuals and rectify any harmful practices. This may involve working directly with suppliers to end exploitative conditions, providing support to impacted workers, or in serious cases, or where improvements are not made to end such practices even ceasing business with non-compliant partners.

Additionally, we will continually review and strengthen our policies and training to prevent recurrence, ensuring accountability and continuous improvement in combatting modern slavery.

### Performance indicators

During 2025 we will be measuring the following KPI's. The results will be communicated on our 2026 statement.

Key Performance Indicator	Purpose
Number of whistleblowing reports relating to modern slavery incidents.	To record the number of modern slavery incidents on an annual basis, including investigation, resolution and corrective actions.
Percentage of all staff within UK operations who have completed Whistleblowing Training.	To empower staff to report concerns or misconduct confidently and safely, fostering a culture of transparency and accountability. This training ensures employees understand their rights, the reporting process, and the protections available to them, ultimately helping to identify and address issues before they escalate.
Prevalence, Vulnerability and Government Response (Walk Free Global Slavery Index) to Modern Slavery in each country Intersurgical has direct Operations.	To understand geographical risk of each country we operate in to help better form local risk assessments.
Risk level of modern slavery in our direct operations based on geographical risk and the type of work being performed.	To understand the combined risk of our own operations taking into consideration the geographical risk and the risk based on the work being performed.
Percentage of all staff within UK operations who have completed Modern Slavery Training.	To equip staff to recognise, prevent, and report potential exploitation, fostering a more vigilant and ethically responsible workforce.
Percentage of staff globally working in the following areas who have completed Modern Slavery Training. <ul style="list-style-type: none"> <li>■ All Managers</li> <li>■ All in HR</li> <li>■ All in Purchasing</li> </ul>	To empower staff to report concerns or misconduct confidently and safely, fostering a culture of transparency and accountability. This training ensures employees understand their rights, the reporting process, and the protections available to them, ultimately helping to identify and address issues before they escalate.
Percentage of staff globally working in Purchasing, or Buying roles to have completed and passed the following in house training modules: <ul style="list-style-type: none"> <li>– IQP601 Purchasing</li> <li>– IQP603 Supplier Evaluation</li> </ul>	To ensure training and awareness of those working in roles having direct contact with suppliers.
Percentage of Workers with age verification checks conducted before job offers are made.	To reduce any potential risk of modern slavery before employment commences.
Minimum age of new employees.	To ensure compliance with employment regulations and company policies on hiring age requirements.
% of new employees with the relevant right to work documentation.	To verify compliance with legal requirements and prevent unauthorised employment.
% of new employees paid at or above the minimum wage.	To ensure fair and legal compensation practices for all new hires.
Percentage of recruitment agencies complying with no-fee policies for candidates.	To ensure compliance with fair hiring practices and prevent unethical candidate charges.
% of new employees to be issued with a new contract of employment.	to ensure that all new hires are provided with a formal, legally binding agreement that outlines the terms and conditions of their employment.



**Charles Bellm**  
Managing Director

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