

WELLAND MEDICAL LIMITED

STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015

INTRODUCTION BY THE BOARD OF DIRECTORS

Welland Medical Limited ("Welland" "we" "us") is committed to act ethically and with integrity in all of our business activities and partnerships. In particular, we will not tolerate any supplier, representative or business partner found to be involved in slavery, servitude and forced or compulsory labour, or human trafficking, and we strive for continuous improvement in maintaining the highest ethical business practices within the company and throughout our supply chain. We are committed to improving our practices to combat slavery, human trafficking and child labour. To this end, we have and shall continue to put into place practices and policies which support the aspirations and objectives of the Modern Slavery Act 2015.

OUR BUSINESS STRUCTURE

Welland Medical Limited was founded in 1987 and in 1997 became a member of the Clinimed Group of Companies. It is now a wholly owned subsidiary of Clinimed (Holdings) Limited, a privately owned company with headquarters in Marlow, Buckinghamshire, which wholly owns six other UK based subsidiaries: Clinimed Limited, Securicare (Medical) Limited, Flexible Medical Packaging Limited, Helapet Limited, Careflex Limited and Hydrokem Aerosols Limited.

Clinimed Limited, as a distributor of medical devices in the fields of ostomy, wound and continence care, is Welland's appointed distributor in the UK, and we are supported by Clinimed (Holdings) Limited, which as our parent company, provides legal, financial, HR support and overall direction to the Group from its offices in Marlow, Buckinghamshire.

Welland is a designer and manufacturer of ostomy appliances which we supply to the healthcare sector both within the UK through Clinimed Limited, and globally through our distributor network. We also procure a limited range of own-brand products from other Clinimed Group companies. We employ 281 permanent staff, all based at our plant in Crawley, West Sussex.

OUR SUPPLY CHAINS

We have considered our main sources of supply of goods and raw materials, as well as our customer base which comprises approximately 34 (thirty-four) distributors globally. We regularly meet with all our distributors and, additionally, invite them to regular distributor meetings in the UK. The overwhelming majority of our distributors are individuals or companies we have been working with over

the long term: we know them well, and they know us as a company and part of a Group with the highest ethical standards.

Our raw materials and distributed goods are mainly sourced from within the UK or Europe, but we also have certain suppliers in other parts of the world and continue to add new suppliers, subject to due diligence and risk assessment.

Certain key supplier agreements include an acknowledgement and acceptance of the principles set out in our Modern Slavery statement, and our supply agreements remain under review as they continue to be rolled out to new and existing suppliers.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Our Purchasing Policy sets out the parameters for the purchase of all goods and services, including the commitment to act ethically, transparently, fairly, and in a non-discriminatory manner. We ensure that the risk of modern slavery is recognised and forms an intrinsic part of purchasing decisions and practices.

We have implemented and seek to continuously improve systems which have the objective of:

- Fully understanding our supply chains.
- Identifying and assessing potential risk areas in our supply chains, including having regard to the geographical location of suppliers and the monitoring of such locations against the Transparency International Corruption Perceptions Index.
- Regularly auditing our suppliers. Where relevant, this includes physical audits (predominantly in UK and European markets); this provides an opportunity to observe and converse with workers at supplier premises.

Audit provides the opportunity to work with suppliers to mitigate the risk of slavery and human trafficking should they be found to be occurring in our supply chains.

In 2023 (10 suppliers) and 2024 (5 suppliers) were identified and audited to either ISO9001 or ISO13485 standards (or equivalent). We have scheduled 8 suppliers to be subject to equivalent (ISO9001 or ISO13485) audits through the course of 2025.

- Continuously monitoring potential risk areas in our supply chains.
- Protecting whistle blowers.

EMPLOYMENT PROCEDURES AND POLICIES

Recruitment policy - we operate a robust recruitment policy, including conducting 'eligibility to work in the UK' checks for all potential staff to safeguard against human trafficking or individuals being forced to work against their will.

Protection of Employees - by maintaining and communicating clear policies and procedures, for example, effective grievance and dignity at work policies, all staff know that they can raise concerns about how they and their colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our policies are designed and strictly adhered to as reassurance to our workers that our Group treats them fairly, equally and transparently and complies with all relevant legislation and best practice.

Agency - We only employ agency workers through reputable employment agencies who are working under one of the industry's governance schemes.

Notwithstanding that we are proud to be accredited to Investors in People Gold, we are seeking to achieve a Great Place to Work certification during the course of 2025. The wellbeing of our staff is an important focus for us, and we have four trained Mental Health First Aiders (and a further eight are scheduled to attend a qualifying course in September 2025) who are known to, and available for, all staff. Our Line Managers also receive mental health awareness training. We extend a Simply Health Benefit to our workforce; this provides unlimited access to a health and wellbeing APP, and services including mental health consultations, 24/7 remote GP appointments, physio and a 24/7 helpline.

We have recently commenced the Great Place to Work initiative and have completed our first GPTW staff survey; we provided feedback results to the staff to ensure that our staff can see that we use the findings to make improvements where recommendations have been identified. We have an Employee Forum which meets quarterly to enable staff to raise suggestions or queries from staff to support our continuous engagement.

POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This statement is supported and reinforced by our Policies and Procedures.

SUPPLIER ADHERENCE TO OUR VALUES

To ensure all those in our supply chain, and contractors, comply with our values we expand our existing work to improve our supply chain compliance programme,

involving the due diligence steps outlined above, by a structured audit programme of suppliers. This is conducted by our Quality team, accompanied by a member of our Procurement department who will ask specific questions in the area of labour standards and modern slavery, and take appropriate corrective action if concerns are noted. Our supplier evaluation questionnaires include appropriate questions and sections concerning ethical practices, and audit responses inform our risk assessment which is regularly reviewed.

Our Corporate Social Responsibility Questionnaire and Supplier Evaluation Questionnaire include an acknowledgement and acceptance of the principles set out in our Modern Slavery Statement. During 2024, a total of 55 Corporate Social Responsibility Questionnaires were sent to and completed by Category 1, 2 and 3 Suppliers (with answers reviewed to ensure that suppliers comply with our policies). New Suppliers now receive Corporate Social Responsibility Questionnaires for completion as part of their mandatory onboarding programme.

We shall disseminate this Modern Slavery Statement to our key suppliers and distributors.

TRAINING

Our values, to which all our staff contribute and share, underpin the Company's ethos:

Excellence - Innovation – Integrity - Quality - Wellbeing

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we make our staff aware of the issue of modern slavery and the company's attitude to it, whilst continuing to foster an environment in which all our staff feel empowered to, and secure in, raising any concerns they may have.

We shall disseminate this Modern Slavery Statement to our staff.

During 2024, we rolled out online Modern Slavery Awareness training to discrete employee cohorts, and through 2025 we shall expand this selection to a broader category of personnel. This training is now included in our induction programme, and for existing staff is refreshed on a regular basis.

Our senior procurement professionals are members of CIPS (Chartered Institute of Purchasing and Supply) which, as an organisation, has a wealth of guidance and online training available. CIPS members undertake mandatory ethics training annually, which sets a global standard for best practice.

FURTHER STEPS

We shall continue to review compliance throughout the coming year, and future statements will demonstrate the development, and the attainment of the goals

expressed herein.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Welland Medical Limited's slavery and human trafficking statement for the financial year ending 31 December 2024.

It has been approved by each of the Board of Directors of Clinimed (Holdings) Limited and Welland Medical Limited.

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Nigel D Piercey
Group Chairman,
Clinimed Group of Companies.

Date: *24th June 2025.*

Sean Farbrother
Chief Executive
Chairman of Welland Medical Limited



Date: *24th June 2025*

