



MODERN SLAVERY STATEMENT

COMPANY INFORMATION

Hygenica (referred to as **we, us, our** or **the company**) is a leading MedTech company pioneering antimicrobial devices that are sold into the healthcare industry, helping to protect patients from potentially life-threatening healthcare-associated infections (HCAIs). Hygenica is headquartered in Wolverhampton, UK.

COMPANY INTRODUCTION

The company operates a limited number of wholly-owned subsidiaries in other jurisdictions around the world for end market or supply-destination purposes. The company's own employees are predominantly long-term full-time employees on full employment contracts. Due to the slight seasonality in demand for the company's products – related to winter illnesses such as influenza – minor use is made of extra workers during the autumn/winter period via agency workers. The company has long-term relationships with a small number of agencies for this purpose.

The majority of the company's suppliers are located in the UK, many within 2 hours of the head office. The company's suppliers do not change on a seasonal or other basis and the company commits to long-term relationships where possible. Where it is not possible to source locally or from the UK, the company has a limited number of supply relationships in locations strategically important for the materials involved. Some of these are categorised as higher risk from a modern slavery perspective due to the locations, sectors and product types involved.

The company has processes for onboarding and retaining suppliers that incorporate on-site visits and audits, regular assessments and ongoing engagement on modern slavery and related labour standards issues. The company operates an anonymous whistleblower mechanism to facilitate confidential reporting of potential improprieties.

Hygenica engages in close and long-term relationships with its suppliers wherever possible. It takes steps to reduce the chance that its procurement practices could create pressure on suppliers that might lead to modern slavery. It considers modern slavery throughout its procurement processes, from needs identification to end of contract review.

STRUCTURE, BUSINESS AND SUPPLY CHAIN

We believe transparency is the best way to assure our stakeholders and the public that we act as an ethical corporate citizen. In line with that approach, we have published our annual statement for slavery and human trafficking - made in compliance with section 54 of the Modern Slavery Act 2015 - in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it.

This statement is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of all companies within the DCCL group, as relevant. Our efforts against slavery and human trafficking complement our broader CSR policies and our adoption of the Ethical Trading Initiative.

Publishing an annual statement allows us to share our efforts against slavery and human trafficking and improve and measure our success each financial year. This past financial year,



ending 29th February 2024, we took the steps set out in this statement to try to ensure slavery and human trafficking did not occur within our organisation or supply chain.

SUPPLY CHAIN SUMMARY

The primary sources of the materials we procure are from Tier One providers that are vetted by the company Production and Operations teams. The mapped supply chain is small and simple, with direct supply from manufacturers; no circular suppliers are utilised. A risk evaluation is undertaken on all suppliers based on the country risk, as defined by the World Bank Governance Indicators and the Global Slavery Index or the SEDEX country risk evaluation, and also based on the volume of supply and the inherent product risk based on the manufacturing processes and industry risks.

Most of these suppliers are located in countries where the risk of modern slavery and human trafficking is low. For the countries from which we source materials where there is a higher risk, we ensure more robust controls are in place through our supplier vetting process and our supplier assessments and agreements.

SLAVERY AND HUMAN TRAFFICKING POLICIES

We fully acknowledge our workers and workforce as a key asset of our company and value their contribution. Workers' rights and their respect is of central importance to us; this includes not only our direct employees but also the subcontractors, agency workers or any other workforce contributing to our supply chain. We operate globally with a commitment to adhering to legislative as well as social duties, to respect the human rights declaration of the United Nations and to comply with the International Labour Organization (ILO) Fundamental Principles of Rights at Work as well as the 9 elements of the Ethical Trading Initiative (ETI) Base Code. Our Modern Slavery Statement informs and integrates into our strategic streams including:

1. CSR Policy
2. Supplier Code of Conduct
3. Procurement Policy
4. Recruitment Policy
5. Whistleblowing Policy

Notably, we developed the slavery and human trafficking elements within Labour Standards Policy. We also updated our Supplier Code of Conduct and Supplier Assessment Questionnaire. Our objectives for our modern slavery and human trafficking plans centre around the following themes:

1. **Relationships:** strengthening our supplier engagement process.
2. **Feedback:** establishing mechanisms and channels for supplier worker feedback to allow for raising issues, making suggestions and reporting slavery and human trafficking.
3. **Knowledge:** improving our knowledge base by collecting relevant data and improving service levels.
4. **Third party engagement:** building alliances with independent social auditors.
5. **Measurable change:** developing verifiable KPIs to measure progress.



6. **Supplier collaboration:** encouraging suppliers to collaborate to address slavery and human trafficking issues. The minimum standards we require, which have been adopted from the Ethical Trading Initiative (ETI) Base Code, include the following:
- Employment is freely chosen
 - Freedom of association and the right to collective bargaining are respected
 - Working conditions are safe and hygienic
 - Child labour shall not be used
 - Living wages are paid
 - Working hours are not excessive
 - No discrimination is practised
 - Regular employment is provided
 - No harsh or inhumane treatment is allowed

DUE DILIGENCE PROCEDURES

We understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over the last 3 years to minimise Modern Slavery. New suppliers and factories/sites are, where appropriate, subjected to due diligence checks in the form of Supplier Assessment Questionnaires and on-site ethical/compliance audits. Such audits are also conducted for existing suppliers and factories/sites. These audits assess compliance with ethical procurement principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

IDENTIFYING, ASSESSING AND MANAGING RISK

We set out to identify the extent of any slavery and human trafficking in our supply chains by:

1. Conducting Supplier Assessment Questionnaires.
2. Initiating on-site visits to conduct social assessment when appropriate based on risk.
3. Interviewing workers to discuss their conditions and their rights where required.
4. Collaborating with suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues, if appropriate. We discovered no instances of slavery and human trafficking within Tier 1 of our supply chain. Therefore, our focus point for the next financial year alongside continued monitoring of Tier 1 will be on the lower tiers of the supply chain.

KEY PERFORMANCE INDICATORS

In order to assess the effectiveness of our modern slavery measures we will be reviewing the following key performance indicators:

1. Staff training levels
2. Policies
3. Risk assessments
4. Due diligence
5. Number of slavery incidents reported in the supply chain
6. Number of SAQs issued and analysed
7. Number of audits/ on-site visits completed



TRAINING AVAILABLE TO STAFF

To promote understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we work to provide awareness training to relevant members of staff. This includes training from International Associates (<https://training.iauk.com>) who provide us with continuing support and updates on the subject.

QUESTIONS ABOUT THIS STATEMENT

If you have any questions about this policy, please contact info@hygenica.com.