

Modern Slavery Act 2015 Policy

Communication

Our group is committed to opposing modern slavery in all its forms and preventing it by whatever means we can.

We demand the same attitude of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is: zero tolerance.

This statement, written with the above sentiment in mind, reflects our corporate value on the prevention of modern slavery and human trafficking. We expect all staff, stakeholders, customers and suppliers to absorb and follow the values herein.

Our aim is the prevention of opportunities for modern slavery (in whatever form) to occur within its businesses or supply chain.

This involves:

- Transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- Transparency from our contractors, suppliers and other business partners.
- All employees having an obligation to remain aware of our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.
- The practical steps of, inter alia:
 - risk assessments on parts of our business and our suppliers are most at risk of modern slavery
 - training of our staff in the Modern Slavery Act
 - liaison with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses
 - Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

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Communication of our policy

The directors of Synergy Medical have overall responsibility for this policy, its zero tolerance position and its implementation which will be achieved by cascading it down to stakeholders, customers, consultants, suppliers and staff. All such people are encouraged to raise (whether with HR, immediate bosses, directors or other points of contact within the group) concerns about suspected modern slavery associated with the business or its stakeholders. Such concerns can be in respect of:

- entities who wish to do business with us or those who already have a business relationship with us
- anyone suspected of seeking to exploit another in a way which could amount to modern slavery;
- any approach from a person acting on behalf of A24 Group or one of our businesses who has invited you to participate in acts which could result in offences under the Modern Slavery Act

We also encourage members of the public to contact a director, in confidence, to raise any concern, issue or suspicion of modern slavery in any part of our business.

We 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 of our supply chains.

This Policy will be reviewed by the CEO on a regular basis and may be amended from time to time.

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