

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

- This statement sets out Howard Wright Europe Limited's (herein HWE) actions to understand all potential modern slavery risks related to its business and to put in place steps that ensure there is neither modern slavery nor human trafficking in its business activities and supply chain. This statement relates to actions and activities during the financial year 1 January 2024 to 31 December 2024.
- In previous years, HWE has not published a statement as its turnover is less than £36 million; the turnover threshold set by the UK Secretary of State under the Modern Slavery Act 2015, Section 54. However, HWE recognise the importance of eliminating modern slavery and human trafficking and have voluntarily issued this statement.
- HWE is absolutely committed to preventing slavery and human trafficking in its business activities and supply chain.

### **Organisational structure and supply chain**

- This statement covers the activities of HWE.
- HWE is based and operates in the UK.
- HWE distribute Howard Wright Limited (herein HWL) medical beds and stretchers (herein the products). HWL is based in New Plymouth, New Zealand. HWE purchases the products directly from HWL. The products are then shipped by sea freight to the UK, stored at a 3PL warehouse and then delivered to directly to hospitals around the UK.
- HWE has 5 employees.

### **Supply chain modern slavery and human trafficking risk assessment**

- The products are sourced directly from HWL. Both the UK and New Zealand have a low risk assessment of modern slavery according to the Global Slavery Index.
- Sea freight is provided and operated by a New Zealand based company with extensive modern slavery policies. Modern slavery risk is considered a low risk.

### **Responsibility**

- **Policies:** HWE's Managing Director and Board of Directors are responsible for putting in place and reviewing modern slavery policies.

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- **Risk assessments:** HWE's Managing Director is responsible for assessing modern slavery risk in HWE's business activities and tier 1 supply chain.
- **Investigations/due diligence:** HWL's ISO13485 Quality Management System provides for the investigation/due diligence of its suppliers, including any suspected incidences of modern slavery and human trafficking.

### **Relevant policies**

- The following HWE/HWL policies/codes are used to identify modern slavery risks and prevent slavery and human trafficking in its operations:
  - **Whistleblowing policy:** HWE/HWL encourages its employees, customers and other business partners to report any concerns in its business activities and supply chain. This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. HWE's whistleblowing procedure is designed to make it easy for its employees, customers and business partners to make disclosures, without fear of retribution. Employees, customers and business partners can contact HWE's Managing Director in the strictest confidence.
  - **Employee code of conduct:** HWE's/HWL's code of conduct sets out the actions and behaviours expected of its employees when representing the company. HWE strives to maintain the highest standards of employee conduct and ethical behaviour.
  - **Ethical trading policy:** HWE/HWL is committed to ensuring its suppliers adhere to the highest standards of ethics. Suppliers are required to comply with the HWL's ethical trading policy which includes the provision of safe working conditions, treating their employees with dignity and respect and acting ethically and within the law. Serious breaches of this policy by a supplier will result in the termination their supply contract.
  - **Agency workers policy:** HWE/HWL use only reputable employment agencies to source temporary labour.

### **Due diligence**

- HWE/HWL undertakes due diligence of new suppliers and regularly reviews existing suppliers. These processes include:
  - Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
  - Evaluating the modern slavery and human trafficking risks of each new supplier.



- Taking steps to improve sub-standard supplier practices including advice, action plans and monitoring.
- Investigating supplier non-conformances and requiring supplier corrective actions under HWL's ISO13485 Quality Management System.

### **HWW/HWL modern slavery goals**

- HWE/HWL supply chain employees to complete modern slavery training by 31<sup>st</sup> March 2024. Completed.
- HWE/HWL supplier modern slavery assessment system (fully developed) in place by 31<sup>st</sup> December 2024.
- All existing HWE/HWL suppliers assessed for modern slavery by 31<sup>st</sup> December 2024.
- All HWE/HWL direct sales employees who interact with tier 1 providers to undertake modern slavery training by 31<sup>st</sup> December 2024.
- All employees who interact directly with suppliers, notably the Research and Development team, to undertake modern slavery training by 31<sup>st</sup> March 2025.

### **Training**

- HWE/HWL require their supply chain employees to complete modern slavery training.
- Modern slavery training covers:
  - Good purchasing practices which prevent purchases at unrealistically low prices.
  - Assessing supplier risk of modern slavery and human trafficking.
  - Identifying signs of modern slavery and human trafficking.
  - Initial actions required if modern slavery or human trafficking is suspected.
  - Escalating potential modern slavery or human trafficking issues to the relevant parties.
  - External help available e.g. the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger Together" initiative.



- Messages, business incentives or guidance that can be given to suppliers to implement anti-slavery policies.
- Steps to take if suppliers do not implement anti-slavery policies in high-risk scenarios, including their termination as a supplier.

### **Awareness-raising programme**

- HWE/HWL have raised awareness of modern slavery issues in their Staff Handbook (HWE)/Policy Manual (HWL) which are included in all employee agreements. These documents cover the following items:
  - The basic principles of the Modern Slavery Act 2015 (UK) and the New Zealand proposed modern slavery legislation.
  - How employers can identify and prevent modern slavery and human trafficking.
  - What employees can do to raise potential slavery or human trafficking issues with the relevant parties in their organisation.
  - External help available e.g. the Modern Slavery Helpline.

### **Board approval**

This statement was approved by the HWE Board of Directors on the 14th of November 2024 and will be reviewed annually.

**Signature:**

**Name:** Bruce Moller

**Date:** 9<sup>th</sup> December 2025