



Slavery and Human Trafficking Statement

Surgitrac Instruments UK Limited adopts zero tolerance to modern slavery and human trafficking. We fully support the government's objectives to eradicate modern slavery and human trafficking. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability

Our Business

Surgitrac Instruments UK is a leading supplier of ophthalmic surgical products, diagnostics and capital equipment to UK ophthalmic practices and the NHS. We are an independent and privately owned company. We are part of the Surgitrac® Instruments Group. Established in 1994, we have supplied globally sourced ophthalmic products for use in the UK. We manufacture Surgitrac®, single-use and reusable instrument and we supply products from a range of established manufacturers, including; Moria, Brumaba, and Biotech Visioncare. We are a leading supplier to the NHS and we offer an extensive range of single-use instruments and packs for a range of procedures, as well as offering bespoke procedure packs.

Suppliers

Surgitrac Instruments UK operates an approved supplier list. Each Supplier is required to complete a LSAS (Labour Standards Assurance System) SAQ and return this with a signed copy of our LSAS Policy before they can be added to our approved supplier list. Suppliers are desktop monitored on an annual basis and periodic site visits are also conducted. If any non-compliance of the ETI Base code is found, the Company will ask the Supplier for an emergency response which comprises a request for a written Corrective Action Plan highlighting any gaps in processes and root causes within 14 days. This will then be approved by all parties involved. Should this Corrective Action plan be deemed unacceptable then resourcing of production from within the Company's existing supplier base shall be implemented within 30 days of the initial breach of the above requirement to meet the minimum labour standards.

KPI's

- Surgitrac will review all risk assessments in line with ISO14971
- Surgitrac will undertake audits of critical suppliers on an annual basis
- All staff will receive LSAS training as part of their induction
- Mock emergency response audits will be conducted annually

Surgitrac® Instruments UK Limited – Manufacturers of specialist surgical instruments

10 Wharfside Business Park, Irlam Wharf Road, Manchester M44 5PN
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Company Registered in England and Wales No. 03005986. VAT Reg No. 638 814 021



Due diligence processes for slavery and human trafficking.

The following form part of our initiative to identify and mitigate risk

- Where viable, endeavour to verify all of our distributors and manufacturers to ensure that there is optimum control of the work environment.
- Where possible, build relationships with our suppliers and make clear our expectations of their business behaviour.
- Ensure that in our national or international supply chains, that our point of contact is with reputable companies and providers, and we expect these companies to have suitable anti-slavery and human trafficking policies and processes in place.
- Have systems in place for the reporting of any concerns and to safeguard the protection of whistle blowers.
- Not make use of any forced labour
- Workers will not be required to lodge 'deposits' or their identity papers with the employer and are free to leave the employer after reasonable notice
- Workers have the right to join or form a trade union of their own choosing and are able to bargain collectively
- The Company shall not discriminate against any person based on race, caste, national origin, religion, age, gender, disability, marital status, sexual orientation, union membership or political affiliation
- Working hours comply with national laws and benchmark industry standards
- The Company will provide a safe and hygienic work environment, and will take all reasonable steps to prevent accidents and injury to health in the work environment
- Wages and benefits paid for a standard working week meet national legal standards or industry benchmark standards, whichever is higher
- Assess our supply chain for high-risk areas and have taken measures to reduce the risk

Training

All members of staff receive induction training with regard to Surgitrac's policies and procedures which include Labour Standards, Ethics, Corporate Social Responsibility, Slavery and Human Trafficking, Equality.

Signed

A handwritten signature in black ink, appearing to read 'Steve Bourne', is written over a light grey rectangular background.

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Steve Bourne Group Business Development Director

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