

MODERN SLAVERY

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**Independence
Products**

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1 MODERN SLAVERY POLICY STATEMENT

Pursuant to applicable regulations, including Section 54, part 6 of the UK Modern Slavery Act 2015, Independence Products Ltd provides the following statement:

Independence Products Ltd (IPL) is an established UK manufacturer of medical devices designed to improve the quality of life of patients with chronic medical conditions. IPL takes a zero-tolerance approach to all aspects of modern slavery and has taken steps to ensure that Slavery or Human Trafficking (as defined in the Act) is not taking place within its business and its supply chains.

IPL has not identified any instances of modern slavery or human trafficking at the company in the last year.

IPL strives to continuously improve the business' understanding of risk and thereby tailor its policies, actions and diligence to prevent infiltration of modern slavery into any aspect of our business. IPL is committed to promoting responsible business practices with all its suppliers; IPL has several corporate policies, including our Standards of Business Conduct, our Global Ethical Business Practices Policy, our Prohibition Against Abuse of Child Labour Policy, our Prohibition Against Human Trafficking Policy and our Supplier Code of Conduct, which address our position on these issues.

IPL's Standards of Business Conduct sets forth our code of ethics and expectations regarding responsible business conduct. It provides information about the standards of integrity that IPL and all affiliated entities require from all their employees, directors and officers, including standards relating to fair treatment and diversity, anti-harassment and bullying, child labour and human trafficking. IPL expects that our consultants, agents, representatives, business partners and suppliers will conform to the behaviours set forth in our Standards of Business Conduct, which are also highlighted in our Supplier Code of Conduct.

IPL has a Whistle-blower Policy that encourages all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retribution.

1.1 SUPPLIER CODE OF CONDUCT

IPL's corporate values and culture statement include an emphasis on 'respect of others'. Consistent with this, IPL has zero tolerance for human trafficking. IPL requests every supplier to acknowledge that they have been provided with a copy of our Supplier Code of Conduct, reviewed it in its entirety, and can commit to comply with its principles. Included in our Supplier Code of Conduct is the requirement that our suppliers behave in a lawful, ethical and socially responsible manner with respect to, among other things, human rights and acceptable working conditions. IPL will not conduct business with suppliers that we conclude or reasonably believe have engaged in child labour law violations or activities that promote human trafficking, forced or involuntary labour. While IPL neither requires annual certifications nor conducts formal on-site audits of all its supplier relationships, IPL (a) conducts new vendor due diligence, which

includes a review of all publicly available news related to legal and ethical practices/violations; (b) ensures its supply contracts contain provisions by which suppliers agree to comply with all laws related to their performance under those agreements; and (c) conducts on-site visits of its primary suppliers from time to time to review and discuss contract and quality performance, which may incorporate review of the Supplier Code of Conduct.

1.2 TRAINING

As indicated above, IPL maintains worldwide Standards of Business Conduct. In creating those standards, IPL considered many different standards relating to the ethical and humane treatment of people, including the International Labor Organization's (ILO's) 'International Labour Standards' and the United Nations (UN's) 'Universal Declaration of Human Rights'. IPL requires that all directors, officers and employees comply with the provisions of its Standards of Business Conduct. All IPL employees are trained on the Standards upon hire and are periodically provided refresher training thereafter, which includes training on the UK Modern Slavery Act.

IPL also provides information and training to its Procurement and Operational Teams directly involved with the selection of new suppliers and ongoing management of current suppliers. This training covers the assurance of ethical business practices by our suppliers.

IPL actively raises awareness of modern slavery and human trafficking issues by distributing not less than annually to all employees, emails and articles that are specifically focused on cases involving modern slavery.

These materials include information regarding:

- IPL's commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

1.3 ACCOUNTABILITY STANDARDS

IPL has Standards of Business Conduct in place that govern the actions of our company and employees and holds them to the highest level of ethical and social responsibilities. IPL's goal is to work with suppliers who embrace and comply with the principles of our Supplier Code of Conduct, and, in turn, to have these suppliers encourage compliance from any suppliers with whom they work in the wider delivery of goods or services for IPL.

IPL employees who do not comply with the provisions of IPL's Standards of Business Conduct may be disciplined. To the extent permitted by law and contractual provisions governing termination rights, we reserve the right to terminate relationships with third parties, including suppliers, who conduct business in a manner that conflicts with IPL's Standards of Business Conduct or Supplier Code of Conduct.

1.4 MONITORING

IPL continuously monitors human trafficking risks; based upon the industry in which we operate, the geographic locations in which we conduct business and/or obtain materials necessary to provide products and services to our customers, by reviewing published country risk profiles for corruption and human trafficking risks and sharing these within the workplace.

IPL is committed to maintaining focus on:

- Continuously developing the maturity of our supplier due diligence program
- Assessing our practices against the requirements of the UK Modern Slavery Act 2015

This statement was executed and approved after a duly noticed meeting of the Directors of Independence Products Ltd, and a link to this statement shall be placed on the homepage of the IPL website.