



Modern Slavery Statement

Organisation

This statement applies to Unisurge International Limited (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year. 1st January 2026- 31st December 2026.

Organisational structure

Place of business and work.

Unisurge International Limited is solely owned by Lohmann & Rauscher International.

Unisurge Head office located at Newmarket, Suffolk Uk.

Function: Main offices/planning/finance/customer service/contracts/procurement/HR/Quality assurance. Logistics/ warehousing / assembly/ production.

Castleford facility

Warehousing/ research and development/ Lab testing for compliance/ logistics.

Unisurge CEO Stuart Wilson.

Organisation is a manufacturer and supplier of customer procedure packs, dressing packs, medical disposable, theatre packs for health care professionals. Organisation supplies single use items in both sterile and non-sterile form. Organisation can sterilise at both our Castleford and Newmarket sites. The business is not seasonal and is steady all year round, supplying to both private and public sector organisations as well as other suppliers and distributors. Organisation supplies outside the UK to the same types of markets, although this is small part of our business currently. The main part of the business is supplying custom procedure packs into the NHS.

Our employed labour is focused entirely in the UK, at times our employees may be required to visit other countries for limited time for trade shows or meeting potential or

existing suppliers. To affirm this is not permanent place of work but occasional visits of short time frames under 7 days to meet the ever-changing needs of the business.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity, or being bought or sold as property.
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation ensures all employees receive Modern Slavery Specific annual training and capacity building through the Smartlog online training portal.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of components and supplementary items that both sold separately and are also used in clinical procedure packs, this comes in both nonsterile and sterile form. The products are often purchased as sperate items for us to assemble in the UK. Also, packs are purchased assembled and sterilised before they are shipped to the UK. Countries we utilise for supply include Pakistan, India, China, Taiwan, Turkey, Europe and the USA. Not all our suppliers are direct from source but also use and intermediary supplier.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist outside the UK. The organisation utilises many suppliers overseas and, in some cases, could unknowingly involve the provision of labour in a country where protection against breaches of human rights may be limited. This exposure is more relevant especially if the supplier is an intermediary. In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place.

When onboarding of new suppliers, we submit to the supplier our code of conduct form which outlines the expectation in accordance with the act. The organisation then follows an evaluation procedure, which is done by way of audit to ensure conformity, this is done periodically.

If there is evidence of nonconformity with the supplier, we will form an action plan with the supplier to become compliant, failure to do so will result in termination of supply.

To affirm both the conduct form and Audit form outline KPI's for the supplier to adhere to in best practice in accordance with the Modern Slavery Act 2015.

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

1. The supplier is certified according to international standards (e.g. ISO 9000, ISO 14000, SA 8000/AA 1000, GMP)
2. The supplier maintains a register of chemical used and proper documentation (i.e. Material Safety Data Sheets)
3. The premises is free from, or benefited from, any form of forced Labour, including bonded Labour, forced prison Labour, slavery, servitude, or human trafficking. Workers have the freedom of movement during their employment.
4. The supplier has not retained any identity cards, travel documents, and other important personal papers of its employees.
5. The minimum age of workers in premises is above 15.
6. The premises have an educational remediation program.
7. The minimum age of workers which is likely to jeopardize their health, safety or morals is above 15.
8. The premises is free from non-discrimination in employment-related decisions.
9. Workers at the premises have the right to freedom of association and collective bargaining.
10. The premises have provided its employees with the protective equipment and training necessary to perform their tasks safely.
11. The premises provide a suitable, clean, and sanitary infrastructure, including access to toilets and potable water, which conforms to the needs of its employees and is adequate to its numbers.
12. The premises is regarded by representative of each working category as a workplace free from violence, including assault, harassment, and threats.
13. The premises have shown to comply with legal minimum standards or industry benchmark standards concerning wages and benefits.
14. The premises has documented that all workers have a written, understandable, and legally binding labor contract.
15. The premises has granted and shown that employees has paid holiday and sick leave each year, as well as parental leave.
16. The supplier has shown that the workweek is limited to 48 hours. Overtime is voluntary, infrequent, and does not exceed 12 hours per week.
17. The supplier has shown that employees are entitled to at least one day off per week.

18. The supplier has shown that all overtime exceeding these limits has been registered and approved by the authorities.

19. The premises has established and maintained emergency procedures to effectively prevent and address all health emergencies and industrial accidents affecting the surrounding community or having an adverse impact on the environment.

20. The supplier has to the auditor's knowledge shown that it is free from being involved with bribing of government officials and others.

21. The supplier is complying with local environmental legislation.

22. The supplier has demonstrated continuous improvements of the overall environmental performance related to significant environmental aspects.

23. The supplier has shown records of:

- Names and ages of all workers.
- Copies of birth certificates.
- Employment contracts
- Timesheets.
- Payroll records, including wage slips and overtime wage records.
- Health and safety records
- Environmental records

24. The supplier has named and assigned one or more management representatives with the responsibility and authority to ensure compliance with the provisions of this code.

Policies

Anti-slavery and human trafficking policy

This Unisurge International Ltd Policy is approved by the UIL Board; it represents the UIL through aligning Unisurge International Ltd Management System processes and people behaviours to the commitments below.

Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers.

Unisurge International Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Commitments

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

- Consistent with our risk-based approach we may require:

Anti-slavery and human trafficking policy

- employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action regarding the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 01/06/26

Signed: Stuart Wilson

Position: Chief Executive Officer