

Modern Slavery Statement

Introduction

Modern slavery is a grave crime and a morally reprehensible act that strips individuals of their liberty and dignity for another's gain. It affects millions of people worldwide, including many in developed countries, who are exploited in various forms of slavery. Every company faces the risk of being implicated in this crime through its operations and supply chain.

At Terumo Aortic (Registered Number: SC079773), we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking within our operations and supply chain. We have taken concrete steps to address modern slavery, as outlined in our statement. This statement details the actions we have undertaken to identify potential modern slavery risks related to our business and to implement measures to prevent slavery and human trafficking during the financial year 2024.

Our Business

We design and manufacture medical devices for vascular and cardiovascular surgery. We operate across two sites: one in Inchinnan, Scotland (Vascutek Ltd.), and the other in Sunrise, Florida (Bolton Medical, Inc). We are part of the Terumo Group, with our ultimate parent company being Terumo Corporation, located in Japan.

The company encompasses all facets of designing and manufacturing medical devices, including research and development, regulatory affairs, sales and marketing, procurement (both direct and indirect), manufacturing, and quality assurance. Our supply chain involves sourcing raw materials and services essential for both the design and manufacture of our medical devices.

We develop relationships with our suppliers based on trust and integrity, ensuring mutual benefits for both parties where possible. Our supplier selection and onboarding process includes financial due diligence and adherence to our terms and conditions which includes health and safety and modern slavery and anti-trafficking standards.

We have not been made aware of any allegations of human trafficking or slavery activities against any of our suppliers. However, should such allegations arise, we would take immediate action against the supplier and report the matter to the authorities.

Risk assessment

In the past year, we conducted a risk assessment of our supply chain by:

- Updating and implementing a new Modern Slavery Policy into our standard Terms and Conditions and these are issued on all purchase orders.
- Reviewing the regions in which our suppliers are based and assess the risk of slavery and human trafficking in these regions using the Global Modern Slavery Index.
- Conducting regular site visits of our key suppliers' premises to assess QMS processes and procedures and any signs of general workplace issues.

In order to identify and mitigate risk we have taken the following actions:

- We have updated and implemented our Modern Slavery Policy into our standard Terms and Conditions and these are issued on all purchase orders.
- We regularly review the regions in which our suppliers are based and assess the risk of slavery and human trafficking in these regions using the Global Modern Slavery Index.
- We have considered each part of our business and have assessed where the greatest risks of slavery and human trafficking arise.

- We conduct regular site visits of our key suppliers' premises to assess QMS processes and procedures and any signs of general workplace issues.

Policies

We have implemented several policies to support our commitment to combating modern slavery, including:

- **Modern Slavery Policy:** Outlines our zero-tolerance approach to modern slavery.
- **Group Code of Conduct:** Outlines our shared set of values holding all associates to the highest ethical standards.
- **Whistleblowing Policy:** Encourages employees to report any concerns related to modern slavery.
- **Procurement Policy:** Ensures that all procurement activities are conducted ethically, sustainably, and in compliance with laws, including those related to modern slavery and human trafficking.
- **Supplier Guidelines (rolled out in 2022):** Sets clear ethical standards for all suppliers, ensuring they follow laws, ethical labor practices, environmental sustainability, and prevent modern slavery. All suppliers must sign and adhere to these guidelines.
- **Anti-Corruption and Bribery Policy:** Ensures high ethical standards and transparency whilst reducing the risk of corruption and unethical practices.
- **Group Compliance Violations Reporting and Anti-Retaliation Policy:** Ensures compliance with modern slavery laws by encouraging the safe reporting of unethical practices and holding violators accountable.

Due Diligence Processes for Anti-Slavery and Human Trafficking

Terumo Aortic conduct due diligence on all new suppliers during the onboarding phase and on existing suppliers at agreed intervals as per our Quality Procedures. This includes:

- Assessing risks in the provision of particular products and services;
- Requiring suppliers to sign and adhere to the above-referenced Supplier Guidelines; and
- Auditing suppliers and their health and safety standards and general labor relations.

Next Steps

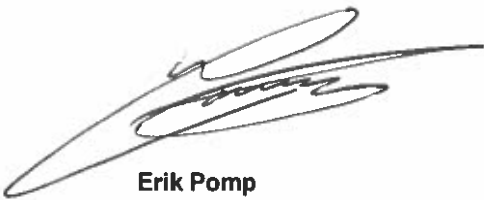
Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- Collaborate with Terumo Corporation and other Terumo entities on a tender for a tool to assess modern slavery and human trafficking which will capture data and create a dashboard of risks, thus enabling a clear risk mitigation action plan to be developed. The tool will also support the measurement of supplier performance in safeguarding against modern slavery and human trafficking.
- Measure how we are performing and develop a defined set of Key Performance Indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:
 - How many employees have completed mandatory training?
 - How many suppliers have filled out our modern slavery questionnaire?
 - How many suppliers have Modern Slavery Policies
 - How many suppliers have rolled out an awareness and training programme that is equivalent to what we will roll out?
 - How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

- We shall continue to conduct regular site visits of our key suppliers' premises and include assessing compliance with legal compliance related to modern slavery and human trafficking.
- We shall continue to build on our supplier onboarding process.
- We shall continue to use our supplier scorecard to review supplier performance, and incorporate compliance with the Modern Slavery Act (2015) and Modern Slavery Policy.
- To build on existing training, the Procurement team will attend training provided by the Chartered Institute of Procurement & Supply (CIPS) in relation to the Modern Slavery Act.
- Raise awareness on modern slavery issues across our sites.
- Roll out E-learning on modern slavery to the wider business.

This statement covers 1 August 2024 to 31 July 2025 and will be reviewed annually.

Approval: This statement has been approved by the Chief Executive of Terumo Aortic (Vascutek Ltd and Bolton Medical, Inc.) on 1 August 2024.

A handwritten signature in black ink, appearing to read 'Erik Pomp', is written over a faint, circular watermark or logo.

Erik Pomp
Chief Executive Officer