

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 Vascutek Limited, trading as 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 2025.

Our Business

We design and manufacture medical devices for vascular and cardiovascular surgery. 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 requires adherence to our terms and conditions which include 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 have introduced the following metrics to measure and report on modern slavery and human trafficking:

- Implemented Modern Slavery Awareness training to over >95% of our associates
- 100% of our Procurement team have completed Modern Slavery training provided by the Chartered Institute of Purchasing and Supply (CIPS)
- 100% of Direct Suppliers have signed up to the Supplier Guidelines (described below)
- Rolled out a helpline for associates to report any Modern Slavery concerns or issues
- Number of associate reports indicating awareness or issues to Modern Slavery – 0

In order to identify and mitigate risk we are continuing with the following:

- Conducting regular site visits of our suppliers' premises to assess QMS processes and procedures and any signs of general workplace issues.
- Updating our standard Terms and Conditions, issued with all our purchase orders, to include a link to our Modern Slavery Policy.
- 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.

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 compliance with 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 Modern Slavery

Terumo Aortic conducts 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 modern slavery or human trafficking in our supply chains, we intend to take the following further steps to combat modern slavery and human trafficking:

- Issue a Modern Slavery Questionnaire to existing and new suppliers at onboarding stage.
- Measure and report the number of suppliers:
 - Who have formal Modern Slavery Policies in place
 - Who have implemented awareness training equivalent to Terumo Aortic standards
- Collaborate with Terumo Corporation and other Terumo entities to assess modern slavery and human trafficking thus enabling a clear risk mitigation action plan to be developed

This statement covers 1 August 2025 to 31 July 2026 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 2025.



Hendrik Pomp
Chief Executive Officer