



Anti-Slavery and Human Trafficking Statement

Vascutek Limited (Registered Number: SC079773) is trading as Terumo Aortic. Terumo Aortic is committed to maintaining and improving our practices to combat slavery and human trafficking.

We are a designer and manufacturer of medical devices for use in vascular and cardiovascular surgery. We are part of the Terumo Group ("Group"), and our ultimate parent company is Terumo Corporation located in Japan.

The company covers all aspects of the design and manufacture of medical devices, including research and development, regulatory, sales and marketing, procurement, manufacturing and quality. Our supply chain includes the sourcing of raw materials and services relating to both the design and manufacture of the medical devices.

Our Policies on Anti-Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

We have an internal Group Code of Conduct presenting a shared set of values holding all associates to the highest ethical standards. Additionally, we have the Group Compliance Violations Reporting and Anti-Retaliation Policy, Group Antitrust Law Compliance Rule, Group Policy for Anti-Corruption and Anti-Bribery (and also for Third Parties), Whistleblowing Policy and our yearly compliance statement specific to each Terumo entity, to ensure policing and standardisation of global operations. We have zero tolerance for corrupt behaviour from both associates and third parties and follow principles of open management, integrity and transparency.

We have a dedicated Compliance Officer who receives support from the following areas:

- Risk management committee
- External legal support
- Compliance
- Human Resources
- Procurement

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant staff where required.

Due Diligence Processes for Anti-Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have taken the following actions:

- We have considered each part of our business and have assessed where the greatest risks of slavery and human trafficking arise.

- We encourage requisitioners to obtain multiple quotes as part of our Procurement process where possible and regularly benchmark supplier pricing as part of cost reduction KPI.
- We conduct regular site visits of our key suppliers' premises to assess QMS processes and procedures and any signs of workplace issues, including (but not limited to) site accommodation and break areas for workers.
- We have incorporated our Anti-Slavery and Human Trafficking Policy into our standard Terms and Conditions, which are applicable to all suppliers.
- We regularly review the regions in which our suppliers are based and assess the risk of slavery and human trafficking in these regions.

We have in place systems to:

- Identify and assess potential risk areas in our supply chain.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.
- Report any issues identified to the Compliance Officer.

Further 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:

- We shall continue to provide our Anti-Slavery and Human Trafficking Policy to any new suppliers.
- We shall continue to conduct regular site visits of our key suppliers' premises.
- We shall continue to use our supplier scorecard to review supplier performance, and this incorporates compliance with the Modern Slavery Act and our Anti-Slavery and Human Trafficking Policy.
- To build upon existing training received, Procurement staff will continue to attend training provided by the Chartered Institute of Procurement & Supply (CIPS) in relation to the Modern Slavery Act.
- As of June 2022, we will implement Supplier Guidelines into our revised supplier set up procedures. This will promote our compliance policies and ethical standards and gives guidance on procedures to be followed in acting as supplier for us, including promotion of compliance, fair dealings, human rights for labour, environmental considerations and management systems.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Vascutek Ltd's slavery and human trafficking statement for the financial year ending 31 March 2022.

Approved by the Board of Directors on 7 June 2022.



Hendrik Pomp

Erik Pomp
President and Director