

Modern Slavery Policy

1. **Purpose** The purpose of this policy is to ensure that Terumo Aortic operates in a manner that is free from modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
2. **Scope** This policy applies to all persons working for Terumo Aortic or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.
3. **Policy Statement**
 - 3.1. **Modern Slavery:** Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
 - 3.2. **Commitment:** Terumo Aortic is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers, and other business partners.
4. **Supplier Guidelines**
 - 4.1. **Supplier Compliance:** All suppliers must agree to and comply with Terumo Aortic's Supplier Guidelines, which include specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
 - 4.2. **Due Diligence:** We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the particular organization has never been convicted of offenses relating to modern slavery.
5. **Responsibilities**
 - 5.1. **Management Responsibility:** Senior management has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
 - 5.2. **Compliance Officer:** The Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
 - 5.3. **Employee Responsibility:** All employees must ensure that they read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
6. **Reporting and Monitoring**
 - 6.1. **Reporting:** Employees and other business partners are encouraged to report any concerns about modern slavery in any parts of our business or supply chains at the earliest possible stage.
 - 6.2. **Monitoring:** We will monitor the effectiveness of the steps we have taken to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

7. 7. Training and Awareness

7.1. **Training:** We provide training to all employees to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

7.2. **Awareness:** We also ensure that our suppliers are aware of our policies and adhere to the same high standards.

8. 8. Review and Updates

8.1. **Annual Review:** This policy will be reviewed annually by senior management to ensure its continued relevance and effectiveness in combating modern slavery and human trafficking.