



Modern Slavery & Human Trafficking Policy 2025

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that Critical Healthcare has taken to prevent modern slavery and human trafficking within its business operations and supply chains.

Critical Healthcare is committed to conducting business responsibly, ethically, and with integrity. We recognise that modern slavery is a global issue that can occur in many forms, including forced labour, child labour, human trafficking, debt bondage, and exploitation. We take seriously our responsibility to identify, prevent, and address risks related to modern slavery in all aspects of our operations.

Our Organisation and Structure

Critical Healthcare was originally founded in 1999, and our headquarters are based in Tullamore. Co. Offaly. We offer a fully regulated and managed service of high-quality medical consumables and devices to the HSE, NHS, and a wide variety of medical professionals and emergency service providers across Ireland, UK and Europe.

All company policies and procedures are reviewed and approved by our CEO and Senior Management Team.

Our Supply Chains

We work with industry leading manufacturing partners and suppliers across Europe, UK, Canada, USA & Asia to provide a full range of medical supplies, PPE equipment and medical devices to meet our customers needs.

We recognise that the greatest risk of modern slavery may occur within our global supply chain and as part of our Quality Management System, we have implemented supplier selection, evaluation and audit processes.

Critical Healthcare has a zero-tolerance approach to modern slavery. 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. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and we expect the same high standards from all our contractors, suppliers and other business partners.

Policies and Governance

We have implemented a number of policies and procedures which are aimed at helping us identify and mitigate the risk of modern slavery in our operations and supply chains, including:

- **Code of Conduct** – Employees are issued with An Employee handbook outlining our commitment to ethical business practices and respect for human rights and includes policies such as Diversity & Inclusion, Dignity & Respect at Work.
- **Supplier Code of Conduct** – We engage with our contractors, suppliers and other business partners at the outset of our business relationship to convey to them this policy and to require them to comply with it, and with the principles enshrined in the Modern Slavery Act 2015.



- **Whistleblowing Policy** – Our employees and business partners are encouraged to report any instances of unethical or illegal behaviour confidentially and without fear of retaliation. The policy is outlined in our employee handbook.
- **Recruitment and Employment Policies** – We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour ensuring fair hiring practices, legal right-to-work checks, and prohibition of recruitment fees. All Employees are issued with a contract of employment setting out the terms relating to their employment. These contracts include confirmation of above minimum wage pay, the rights to terminate their employment, and rules on overtime.

Risk Assessment and Due Diligence

We are committed to identifying and mitigating the risks of modern slavery within our operations and supply chain through:

- Supplier risk mapping considering factors such as geography, industry, and category of goods.
- Due diligence checks for new and existing suppliers for compliance with human rights and labour rights.
- Enhanced due diligence checks on suppliers based in high-risk countries as outlined on Global Slavery Index.
- Annual audits of suppliers based on a risk-based approach.

Training and Awareness

We provide regular training to all employees across the company to help them identify signs of modern slavery and understand how to report concerns. We also communicate our policies and expectations to suppliers and monitor their compliance to Modern Slavery Act 2015.

Performance Indicators

We will continue to monitor our performance on the following:

- Employee training.
- Incidents or reports raised by employees and suppliers and the effectiveness of the actions taken.
- Effectiveness of our company policies.
- Improvements in supplier audit results.
- Supplier engagement on Anti-Slavery activities and compliance to Labour Laws.

Signed:

A handwritten signature in black ink, appearing to read "Vinnie Glennon", written over a horizontal line.

Vinnie Glennon
CEO