

	Resource Management	MDL 309A rev0		Date: 30-09-25
	Modern Slavery Annual Statement			Approved By: 
This Policy is reviewed annually	Last Reviewed		Next Review due	SEP 2026

MODERN SLAVERY ANNUAL STATEMENT 2025

Introduction

Bolton Surgical have a zero tolerance towards modern slavery and human trafficking in our business and supply chain. We are committed to developing and improving our practices to combat slavery and human trafficking. We recognise that slavery and human trafficking is a real yet hidden issue in our society. 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 that any form of slavery does not and will not take place in our own business or supply chains.

Organisation's Structure

We manufacture, supply, distribute, repair and refurbish Surgical Instruments and Medical Devices for the Healthcare market in the UK and overseas.

All our operations are based in Sheffield, England which includes our head office, manufacturing, warehousing, regulatory, sales, finance and administration facilities.

We work with a number of partners, agents and distributors globally and in the UK have a number of Sales Consultants who work directly with customers.

Responsibility

We recognise that our responsibility for human trafficking and modern slavery encompasses:

- Bolton Surgical Site – In developed countries, performance in accordance with UK and EU regulations.
- Supply Chain – We will use our best endeavours to ensure that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions.

We believe that everyone in our organisation should have due regard for modern slavery and human trafficking in particular:

- The Board of Directors has overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed.
- Managers and supervisors provide visible leadership that promote human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur.
- All employees are encouraged to bring forward, in confidence, any concerns that they may have about modern slavery or human trafficking.

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We operate a number of policies and systems to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment** – Bolton Surgical operate a robust recruitment system, including conducting eligibility checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Labour Standards and Assurance System** – Bolton Surgical is committed to ensuring that our business performs in accordance with UK and EU regulations. We will use our best endeavours to ensure that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions.
- **Whistleblowing** – Bolton Surgical ensures that all employees and stakeholders know that they can raise concerns about practices within our business or supply chain, anonymously and without fear of reprisal.
- **Corporate Social Responsibility** – Bolton Surgical actively support and demonstrate the principles of CSR within our Company and encourage our supply chain to do the same.
- **Anti-Bribery and Corruption** – Bolton Surgical is committed to ensuring we carry out our business dealings in a fair, open and honest way. It is our aim to only conduct business with organisations who comply with the Bribery Act 2010.
- **Health and Safety** – Bolton Surgical is committed to ensuring we provide a healthy working environment for our staff and contractors that work out of our premises.
- **Ethical Trading Policy** - Bolton Surgical Limited understands the responsibilities and challenges involved in ensuring the highest social, ethical and environmental standards are maintained within our own business operations and throughout our supply chain. We therefore recognise and support the requirements of ETI Base Code (reference 1) which is founded on the conventions of the International Labour Organisation (ILO) (reference 2) and is an internationally recognised code of labour practice.

Our supply chains

Our supply chains include suppliers of direct materials, suppliers of indirect services (professional services, facilities, sales and marketing agencies) and distributors of our products.

All potential suppliers for Bolton Surgical go through an approval process before being awarded approved and validated supplier status.

This due diligence includes assessing regulatory approvals, licences and certificates, compliance with such regulatory bodies, checks to determine the financial stability of the supplier as well as carrying out Labour Standards and Assurance checks which may include supplier audits either on-site or remotely where appropriate.

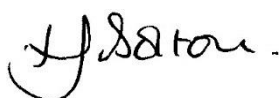
Further steps

We intend to take the following further steps to assist our business in combatting slavery and human trafficking:

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1. risk assess all new suppliers in line with our Labour Standards and Assurance protocols (LSAS) and ask them to certify that they have taken steps to eradicate modern slavery within their own organisation and supply chain;
2. notify all existing suppliers of our expectations and their obligations in relation to the prohibition of modern slavery;
3. incorporate anti-slavery and human trafficking obligations into procurement agreements and subcontracting arrangements on a risk assessed basis;
4. include appropriate measures in our due diligence processes for sourcing suppliers, subcontractors on a risk assessed basis;
5. provide training where relevant to employees to ensure a high-level understanding of the risks of modern slavery and human trafficking; and
6. where appropriate we will include reference to the Modern Slavery Act 2015 in our policies and procedures.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the current financial year.



Lyndsey J Bolton
MANAGING DIRECTOR
Bolton Surgical Limited

Related documents – Further reading

ETI Base Code Guidance on Modern Slavery

https://www.ethicaltrade.org/sites/default/files/shared_resources/eti_base_code_guidance_modern_slavery_web.pdf

ETI Base Code Guidance for Freedom of Chosen Employment

https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29.pdf

ETI Corporate Approaches to Addressing Modern Slavery

https://www.ethicaltrade.org/sites/default/files/shared_resources/corporate_approaches_to_addressing_modern_slavery.pdf