

MODERN SLAVERY POLICY

1. INTRODUCTION

Axis Medical is committed to preventing modern slavery and human trafficking in all aspects of our business operations and supply chains. We uphold the highest ethical standards and expect the same from our employees, suppliers, and business partners.

2. SCOPE

This policy applies to all employees, contractors, suppliers, and business partners of Axis Medical. It sets out our commitment to ethical business practices and outlines measures to identify, prevent, and address modern slavery risks.

3. OUR COMMITMENT

Axis Medical has a **zero-tolerance approach** to modern slavery, including forced labour, child labour, human trafficking, and other forms of exploitation. We are committed to:

- Complying with all relevant anti-slavery laws and regulations.
- Conducting due diligence to identify and mitigate risks in our operations and supply chains.
- Ensuring our suppliers and partners adhere to ethical labour standards.
- Providing training and awareness to employees on recognizing and reporting modern slavery risks.

4. SUPPLIER AND PARTNER EXPECTATIONS

We require all suppliers and business partners to:

- Comply with our **Supplier Code of Conduct**, which prohibits forced labour and human trafficking.
- Maintain transparent and ethical labour practices.
- Cooperate with audits and assessments to ensure compliance with anti-slavery commitments.
- Report any known or suspected cases of modern slavery within their operations.

5. DUE DILIGENCE & RISK ASSESSMENT

To prevent modern slavery, Axis Medical will:

- Conduct risk assessments of suppliers and partners, prioritizing high-risk industries or regions.
- Include contractual clauses requiring compliance with anti-slavery laws.
- Perform audits and site visits where necessary to monitor adherence.

6. REPORTING & WHISTLEBLOWING

Axis Medical encourages employees, suppliers, and stakeholders to report concerns related to modern slavery. Reports can be made confidentially with protection against retaliation for whistleblowers.

7. TRAINING & AWARENESS

All employees involved in procurement, supplier management, and business operations will receive **modern slavery training** to recognize, prevent, and address exploitation risks.

8. MONITORING & CONTINUOUS IMPROVEMENT

We will regularly review and update our policies, conduct audits, and collaborate with industry partners to improve our approach to tackling modern slavery.

9. ACCOUNTABILITY

Responsibility for implementing this policy lies with the **Board of Directors**, with oversight from senior management. Compliance will be reviewed annually, and updates will be made as necessary.

THIS STATEMENT IS MADE PURSUANT TO SECTION 54(1) OF THE MODERN SLAVERY ACT 2015 AND CONSTITUTES OUR MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT.

VERSION CONTROL

VERSION	DATE	AUTHOR	CHANGES / UPDATES	APPROVAL
1.0	26 th Feb 2025	Dries Vanbiervliet (CEO)	First version of the policy	Alex Myers, Chairman of the Board
1.1	26 th Feb 2025	Sebastien Jacquemoud (Uplift)	Minor wording updates and clarifications	Alex Myers, Chairman of the Board
1.2	28 th Feb 2025	Aaxis Medical	Added supplier compliance section	Alex Myers, Chairman of the Board
1.3	3 rd March 2025	Aaxis Medical	Updated reporting and monitoring framework	Alex Myers, Chairman of the Board
2.0	4 th Mar 2025	Dries Vanbiervliet (CEO)	Comprehensive policy review and update	Alex Myers, Chairman of the Board
2.1	26 th Mar 2026	Aaxis Medical	Comprehensive review and format update	Alex Myers, Chairman of the Board