

## **FY25 Modern Slavery Act Transparency Statement**

The UK Modern Slavery Act (2015) prescribes that certain commercial organizations must prepare for each financial year, a slavery and human trafficking disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains.

### **Introduction**

At Terumo Neuro Europe we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking within our operations and supply chain. We have taken concrete steps to address modern slavery as outlined in our statement. This statement details the actions we have undertaken during financial year 2025 to identify potential modern slavery risks related to our business and to implement measures to prevent slavery and human trafficking.

### **Our Business**

Terumo Neuro Europe is a developer, manufacturer, supplier, distributor and service provider in the field of medical devices. It does business in the United Kingdom through its affiliate Terumo Neuro UK Ltd. and across the wider Europe, Middle East & Africa region. Further details of the Terumo group of companies can be found at [Compliance | Terumo Neuro](#)

We develop relationships with our suppliers based on trust and integrity, ensuring mutual benefits for both parties where possible. Our supplier selection and onboarding process includes financial due diligence and adherence to our terms and conditions which includes health and safety and modern slavery and antitrafficking standards.

We have not been made aware of any allegations of human trafficking or slavery activities against any of our suppliers and/or that are otherwise relevant to our business. However, should such allegations arise, we would take immediate action against the supplier and report the matter to the authorities.

### **Risk Assessment**

In the past year, we conducted a risk assessment of our operations by:

- Completing a sustainability assessment with CSR ratings provider Ecovadis SAS; and
- Reviewing our risk tiering for supplier engagements.

We also assigned a project team to prepare for our upcoming CSRD implementation, which will help combat human rights violations and trafficking through more comprehensive risk management and increased supply chain transparency

In order to Identify and mitigate risk we have taken the following actions:

- Sustainability Board & Governance model for ESG matters: We have put in place a dedicated Sustainability Board and appointed a Sustainability project manager, reporting to our Sr Leadership team and ultimately our Board of Directors on related risks, opportunities and activities.
- Supplier Code of Conduct: we have updated our supplier code of conduct, which sets clear ethical standards for all suppliers. Ensuring they follow laws, ethical labour practices. environmental sustainability and prevent modern slavery. All suppliers must adhere to the Supplier Code of Conduct.
- Procurement Policy (currently being updated): the objective is to strengthen our vendor onboarding and monitoring programs and related internal controls by defining more comprehensive risk tiering categories to ensure that procurement activities are conducted ethically, sustainably and in compliance with laws, especially those where there may be an increased risk related to modern slavery incl. human trafficking and similar matters.
- We regularly review the regions in which our suppliers are based and assess the risk of slavery and human trafficking in these regions using the Global Modern Slavery Index.
- We have considered each part of our business and have assessed where the greatest risks of slavery and human trafficking might arise as part of an overall comprehensive review of our supply chain & operations.
- We have regular meetings/visits with key suppliers, distributors other and business partners and are developing a comprehensive monitoring and audit program, which may include regular site visits of our key business partners' premises to assess processes and procedures and any signs of general workplace issues. To date, our initial focus has been on distributor management, while key logistics providers also undergo extensive review and regular follow up.

## **Policies and Processes**

We have implemented several policies to support our commitment to combating modern slavery, including:

- Modern Slavery Policy: Outlines our zero-tolerance approach to modern slavery.
- Group Code of Conduct: Outlines our shared set of values holding all associates to the highest ethical standards. The Code follows our parent company policies and is aligned with the ethical requirements of relevant sector organizations (such as MedTech Europe). Moreover, Terumo undertakes several efforts to ensure such compliance. These measures include due diligence procedures, internal training of associates, internal audit, the implementation of a whistleblowing policy and the operation of a Terumo Integrity Helpline.
- Speak Up Policy: Encourages employees to report any concerns related to modern slavery.
- Procurement Policy & Supplier Code of Conduct, as mentioned above.
- Anti-Corruption and Bribery Policy: Ensures high ethical standards and transparency while reducing the risk of corruption and unethical practices.
- Group Compliance Violations Reporting and Anti-Retaliation Policy: Ensures compliance with modern slavery laws by encouraging the safe reporting of unethical practices and holding violators accountable.

## **Next 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:

- Collaborate with Terumo Corporation and other Terumo entities on a tender for a tool to assess modern slavery and human trafficking which will capture data and create a dashboard of risks, thus enabling a clear risk mitigation action plan to be developed. The tool will also support the measurement of supplier performance in safeguarding against modern slavery and human trafficking and other ESG related risks.
- Measure how we are performing and develop a defined set of Key Performance Indicators and controls to combat modern slavery and human trafficking and other ESG related risks in our organization and supply chain.
- using a risk-based approach, we shall continue to conduct regular site visits of select distributors and other business partner premises and include assessing compliance with legal requirements related to modern slavery and human trafficking.
- We shall continue to build on our supplier onboarding process and supplier evaluation processes to review supplier performance, including incorporating compliance with the Modern Slavery Act (2015) and Modern Slavery Policy.
- We will further build on existing training programs for all key stakeholders in our distributor management and procurement programs and raise awareness on modern slavery issues across our sites.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2024.



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