



Modern Slavery Statement 2021

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This updated statement is made pursuant to The Modern Slavery Act 2015 and sets out the steps that Spineart UK Limited has taken in 2021 to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

Our Business

Spineart UK Limited is a commercial business based in the UK. We provide spinal implants and services direct to NHS supply chains, NHS organisations and Private healthcare groups in England, Wales and Scotland. The company is a subsidiary of Spineart SA, based in Geneva, Switzerland.

Policies on Slavery and Human Trafficking

Spineart is committed to ensuring that there is no modern slavery or human trafficking, in any part of our business activities or supply chain. As an organisation, operating and providing products and services to both private & public sector clients, we acknowledge our responsibility to act in an ethical manor and with integrity at the core of all of our business relationships. Implementing, enforcing and reviewing our controls on slavery and human trafficking are an integral part of our ethical trading.

To ensure that Spineart is commitment to prevent modern slavery and human trafficking in its operations and supply chain, the company has the following internal policies and procedures.

- Recruitment – we operate a robust screening process where relevant checks are undertaken to ensure that all new employees are eligible to work in the United Kingdom and are not being forced to work against their will
- Whistleblowing Policy – the company has a Whistleblowing Policy which provides employees, suppliers, customers and others with the confidence to report any concerns regarding our business activities, including issues involving modern slavery and human trafficking.
- Procurement – When undertaking procurement of services and goods we assess prospective supplier(s) to ensure: (i) they comply with all relevant Law and Guidance and shall use Good Industry Practice to ensure that there is no slavery or human trafficking in its supply chains; and (ii) they shall notify Spineart Senior Managers immediately if it becomes aware of any actual or suspected incidents of slavery or human trafficking in its supply chains. Additionally, all suppliers are checked to ensure that they are working to ISO13485.

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Due Diligence Processes

Spineart has an internal risk management process to ensure that risks are identified and mitigated with appropriate controls implemented. As part of our risk management process, we have systems in place to identify and assess potential risk areas for modern slavery and human trafficking. These processes operate both within our business and our supply chain. Concerns raised through our Whistleblowing policy are thoroughly investigated and those raising concerns are protected.

Supplier Compliance to Our Ethical Trading

Spineart UK Limited recognises the importance of influencing ethical business practices through its supply chain and, in this regard, shall seek compliance with its high ethical standards from all of its suppliers in respect of modern slavery and human trafficking. Potential suppliers shall be assessed as part of any procurement exercise as well as during contract performance reviews. Where appropriate, contract clauses shall be used to facilitate compliance. Compliance shall involve Senior Managers and Directors with support from our Human Resources, Procurement and Legal Team where required.

Training

Spineart reviews training requirements for employees regularly in order to identify training needs and ensure a high standard of competence for all of its staff. Training records, including relevant test results, are maintained by the Education Department and reviewed with the relevant Country Manager on an annual basis. Gaps in knowledge and compliance are identified and corrective action is planned and delivered. The need for awareness and training for all staff in respect of modern slavery and human trafficking, will form a part of the annual training review process.

This statement has been approved by the Board of Directors in March 2021

Signed

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