Modern Slavery Statement

1. Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, often in horrendous conditions from which the victim cannot escape. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. We have 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 our supply chains.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

2. Statement

We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

This statement relates to the company financial year ending 30th November 2025

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

3. Organisational Information

Hamilton Medical UK Ltd is a wholly owned subsidiary of Hamilton Medical AG, headquartered in Switzerland. The UK entity is responsible for the sales, distribution and customer support of Hamilton Medical's product portfolio, across the United Kingdom. Renowned globally for their innovation and precision in mechanical ventilation, Hamilton Medical designs and manufactures a comprehensive range of products to support respiratory care in intensive care units, emergency transport, and neonatal applications. Hamilton Medical UK ensures that healthcare providers throughout the UK have access to these state-of-the-art technologies, along with responsive service, training, and clinical expertise tailored To the needs of local NHS and private sector partners.

4. Our Supply Chain and Procurement

Hamilton Medical UK Ltd operates within a focused yet globally integrated supply chain, primarily sourcing products directly from its parent company, Hamilton Medical AG, based in Switzerland. As a UK based distributor, the company does not manufacture equipment locally but plays a vital role in the final-stage logistics, customer service, and technical support for a range of critical care ventilators and associated devices

Hamilton Medical UK are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks. We ensure we carry out supplier due diligence.
This includes:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify geographical areas of higher risk

5. Areas of risk identified within the business and supply chain

Hamilton Medical UK has mapped its suppliers including 185 (Tier 1) UK based suppliers and 497 (Tier 2) of its Switzerland based parent company.

Supplier risk assessment:
We conduct an annual risk assessment of our suppliers in relation to Modern Slavey using the following process:

- The risk level is determined using the scale according to the global slavery index. https://www.globalslaveryindex.org
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods
- Then the sector is checked against the ILO's Global Estimates of Modern Slavery

Findings:

Tier 1

2 suppliers identified as medium risk, with the remaining 99% identified as low risk.

The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as low.
This risk level will be reviewed yearly and reported on.

Tier 2

99% of the suppliers in our Tier 2 are identified as Low risk. The 1% that are at medium risk are based in China and we engage with them more closely.
This risk level will be reviewed yearly and reported on.

6. Policies and Processes relating to Modern Slavery

The following company policies support our Modern Slavery due diligence:

- Behaviour in Business
- Code of Ethics
- Supplier Code of Conduct
- Whistleblowing Regulations

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.
Below are the key performance areas that we assess:

1. Policies
2. Risk Assessments
3. Due Diligence
4. Training

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

1. Update of the Modern Slavery Statement and review of supporting policies annually
2. Annual Supplier modern slavery risk assessment
3. The number of modern slavery cases identified and remediated
4. Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

7. Training of employees around Modern Slavery

We provide third party independent training on Modern Slavery through 'Tick the Box Compliance Solutions' to all employees.

The training covers:

- The ILOs Forced labour indicators
- The training ensures that recipients understand
    - Indicators of modern slavery
    - How to report suspicions of modern slavery
    - The modern slavery statement requirements
    - How to consider modern slavery risks in procurement
    - How to be better equipped to undertake modern slavery due diligence for the organisation

The training is delivered via e-learning and participants are required to pass the course using a competency-based exam.

The training is mandatory and is provided on induction and then every 2 years.

8. Reporting

If a case of Modern Slavery is suspected, then the following is advised.

A suspected victim of modern slavery is not to be confronted directly as this may endanger them.

If an immediate risk to life, then call the local emergency number (e.g. 911 in the US, 112 in Europe, 999 in the UK), then contact the national helpline or report it online.

Helplines and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://help.unhcr.org/hungary/wp-content/uploads/sites/86/2022/04/trafficking-hotlines.pdf	
UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager and also have access to our whistleblowing process. IntegrityPlus, an independent, external service provider, manages our whistleblowing hotline. https://www.hamilton-medical.com/en_GB/Legal-information.html

If there are concerns around modern slavery with any of our suppliers, we will first look to work with them to remedy the situation with an improvement action plan implemented and more rigorous auditing of the organisation.

If the response from any of our suppliers seems inadequate and appropriate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that

company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If modern slavery is identified or suspected, and resolution is not possible with the supplier, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

G. Breaches

Any employee who is in breach of our polices related to this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
Any suppliers, individuals or organisations working with us, or on our behalf, who breach our polices related to this statement may have their relationship or contract with us terminated.

10. Responsibility

Overall responsibility for this policy is shared by:
Ian Bell – Country Manager
Sweta Bartlett – Quality and Operational Excellence Manager
Amy Dhillon – Office Manager

11. Review and Communication

This statement will be reviewed by senior management, signed by a director or equivalent and then published on our website. Internally it will be sent to all employees and made available to our supply chain and other interested stakeholders.

12. Board / Senior Management Approval

SIGNED: 

NAME: Ian Bell

JOB TITLE: Country Manager / Director