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<b>Modern Slavery Statement</b>
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Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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.

Rocket Medical is committed to improving our practices to combat slavery and human trafficking and have both this policy and the Social Accountability Policy to cover these requirements.

**This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.**

**The information contained within this statement refers to the financial year 2021-2022.**

#### **Organisational structure**

Rocket Medical are a manufacturer of medical devices for the health care industry complying with relevant Regulations for the supply of such devices. Our notified body is BSI, who will conduct regular audits across the business to ensure compliance to these regulations.

Headquartered in Watford - UK with the majority of staff being located in our manufacturing facility in Washington, Tyne & Wear, UK. Further locations are cited in Pembroke – USA and Berlin – Germany with additional staff employed in Ireland and Australia.

The company has a target turnover of £30m for the year ending 2022.

#### **Definitions**

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

#### **Impact of COVID-19**

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

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The Organisation welcomes the UK Government’s decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2021-2022 line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did/did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under ‘POTENTIAL EXPOSURE’ above.

During the pandemic, employees still had access to the grievance procedure to raise any concerns that they may have had.

In line with emergency legislation passed by the Government, employees have been paid Statutory Sick Pay during periods of self-isolation where it has not been possible to agree a temporary period of homeworking. The Organisation took the decision from the outset of the pandemic to ensure that all of the workforce who were required to self-isolate in accordance with public health guidelines continued to receive full pay during their absence subject to the company sickness payment policy.

Rocket Medical assessed that modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

**Our policies on slavery and human trafficking**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery and Human Trafficking Policy along with an audited Labour Standards Assurance System. Our policies demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

**Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place:

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**Human Resource procedures**

- A comprehensive range of policies and practices have been applied and are covered in the Company Handbook, including, Equal Opportunities, Non-Harassment, Equality and Diversity, formal grievance and disciplinary policies to protect and ensure that staff rights and responsibilities are upheld. These policies are communicated upon induction into the company and refreshed regularly.
- Regarding pay the company uses a recognised CIPD benchmarking system and ranks each individual against this structure for UK based staff and meets all legal minimum wage and labour standards for all employees internationally.
- Identity and verification checks are carried out for all employees

**Procurement procedures**

- Engagement with our supplier base is via our logistics department interaction and audits carried out by the quality department. We are looking to identify and monitor potential risk of slavery and human trafficking in our supply chains.

**Supplier adherence to our values**

Rocket has a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain (including contractors) comply with our values we have in place a supply chain compliance action list.

- Engage with supplier base to secure a commitment to work with the Rocket to identify and monitor slavery and human trafficking down the supply chain.
- Register all supplier responses in line with our LSAS policy and procedures.
- Engage with potential new suppliers about commitment to our Modern Slavery Policy.

**Raising awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide training to our staff, at induction on Modern Slavery and via regular management review meetings. Regular postings via the company notice screen will cascade the information throughout the organisation. Monitoring will be managed through current procedures.

We also require our business partners to provide training to their staff and supply chains.

Our effectiveness in combating slavery and human trafficking

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We have built upon existing LSAS monitoring already in place and developed further processes to allow for more effective reporting in the longer term.

**Further steps**

Following a review of the effectiveness of steps we have taken to date to ensure that there is no slavery or human trafficking in our organisation and supply chains we intend to take the following further steps to combat slavery and human trafficking.

**Human Resources**

Our policies and reporting mechanisms are regularly reviewed to identify areas for further review and issues to be addressed.

To inform ourselves of possible inconsistencies between policy and practice, we are going to undertake Staff Surveys, which will include questions about the experiences of staff relating to their work at Rocket, instances of bullying/harassment/discrimination and the ability to manage work-life issues as employees of the business. We also conduct exit interviews which are a fair and frank discussion about the reasons for leaving.

Action plans will be developed to tackle issues that are identified.

**Pay Review**

Rocket has conducted bench mark reviews of all staff across the business and aims to pay a competitive salary within the benchmark range and considering legal minimum requirements mindful to ensure talent and skills attraction and retention.

We expect all our supply base to act in a similar manner and are in the process of managing the transition of LSAS to Modern Slavery via a questionnaire-based system. This will happen throughout 2023 with all responses being reviewed and appropriate action taken to improve upon where our supply chain currently stands. All responses to the questionnaires will be held centrally on our Quality software platform, to allow for monitoring and reporting. General reporting will be via the management review on an annual basis with individual actions being handled at the time of response.

**Slavery Compliance Officer**

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the company obligations.

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This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

L. Todd  
Director  
Rocket Medical Plc.

Updated: July 2022