



# **Modern Slavery and Human Trafficking Statement**



## **Introduction**

Although not legally required to publish a statement under section 54 of the Modern Slavery Act 2015 due to our size, we choose to do so voluntarily to demonstrate transparency and our commitment to ethical practice.

Medefer Limited is committed to acting ethically and with integrity in respect of all its business activities. The Company adopts a zero-tolerance approach to modern slavery and human trafficking throughout all of its business dealings and expects its suppliers and relevant stakeholders to adopt a similar approach.

In doing so, the Company endorses full compliance with relevant laws through the implementation and promotion of ethical business practices to protect workers from being exploited both within Medefer and its supply chains.

This statement is provided voluntarily to show our commitment to tackling slavery and human trafficking. It outlines our risk assessment and the significant steps adopted by the Company to ensure that modern slavery or human trafficking does not occur in Medefer and/or any of our supply chains.

This statement applies to all employees, workers or any persons working for us on our behalf in any capacity, including agency workers, contractors, external consultants, third-party representatives and business partners.

## **Organisational Structure and Supply Chains**

Our specialist Consultants work to help our partners reduce patient waiting times and create a more sustainable outpatient service. We support patients from their initial GP referral by our team of specialists to determine the need for further investigation, treatment or discharge.

As and when the Company engages in business with any suppliers or contractors, we are committed to undertaking due diligence to ensure there is no modern slavery or human trafficking occurring within any of our supply chains, including within the expansion into physical consultations.

## **Responsibility**

The CEO has overall responsibility for ensuring this policy complies with the Company's legal and ethical obligations, and that all employees comply with the policy.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all employees and contractors to complete online mandatory training during their induction.

Modules on modern slavery are included within our Safeguarding level 1, 2 and 3 training, which is assigned based on the role. All staff members are required to complete refresher training at least every three years. Training completion and



compliance are monitored monthly by the governance team.

## Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies are key to our approach:

- **Freedom to Speak Up Policy:** The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains, with the assurance of protection.
- **Health, Safety and Wellbeing Policy:** The Company's Health, Safety and Wellbeing policy outlines our commitment to a safe and responsible working environment and summarises how we manage our environmental impacts.
- **Staff Recruitment Policy:** If the Company uses employment agencies, we verify the practices of any new agency used. Our internal procedures include pre-employment screening of all potential employees to determine their right to work in the UK. We also require DBS (or equivalent) checks to be undertaken, and the level depends on the role within the Company.
- **Equality, Diversity and Inclusion Policy:** This underpins our commitment to fair treatment and ensuring no harsh or inhumane treatment is accepted or allowed.

In addition to our policies, our values and expected behaviours underpin our culture and outline the expectation of our people's behaviour with colleagues, partners and patients.

## Internal Commitments and Controls

As part of our commitment, we have robust internal controls to:

- Ensure all employees are paid at least the National Living Wage, working hours comply with Working Time Regulations 1998, and all staff have the legal right to work in the UK.
- Ensure any form of child labour or exploitation is not present in any part of the business or its supply chain.
- Promote an environment free from all forms of discrimination in any aspect of the business, including recruitment and selection procedures, access to training, and promotion.
- Ensure staff are aware, through our policies and training, of the procedure to follow should they have any concerns.
- Ensure compliance with IR35 regulations, conduct right-to-work checks, and verify the status of subcontractors.

## Due Diligence and Risk Management

Medefer is actively improving its supply chain due diligence processes.



We have integrated modern slavery risk due diligence assessment into our formal supplier onboarding. This includes a questionnaire for key suppliers asking them to verify their own commitments, policies and risk assessments.

### **Performance indicators**

We are committed to preventing modern slavery and human trafficking. We routinely review and enhance our policies, procedures, systems and controls to ensure their ongoing effectiveness.

We have not been informed of any incidents of slavery or human trafficking during the last year. However, we will investigate any allegations should they arise and take necessary action accordingly.

Of all new employees and contractors, 100% completed the mandatory induction training assigned to their roles during the last year.

Our goals for the next year include:

- Fully implementing our Supplier Questionnaire for all new and existing suppliers.
- Review our policies and training effectiveness as appropriate to ensure they meet the needs of our evolving business.

This statement will be reviewed and updated annually.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Dr Bahman Nedjat-Shokouhi

Position: CEO

Date: 16<sup>th</sup> November 2025

Signature: 