



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

MEDICOM SAS is committed to conducting business ethically, responsibly and with integrity in all areas of its operations and supply chains. We maintain a zero-tolerance approach to modern slavery, forced labour, child labour, servitude and human trafficking.

This Statement outlines the actions taken by MEDICOM SAS during the reporting period to prevent modern slavery and human trafficking within our business activities and throughout our supply chain. It has been prepared in accordance with the principles of the UK Modern Slavery Act 2015 and reflects our commitment to protecting human rights and promoting ethical business practices.

2. Our Organisation

MEDICOM SAS is a manufacturer and supplier of single-use medical and personal protective equipment serving healthcare professionals, distributors, industrial customers and public sector organisations throughout Europe and internationally.

Our portfolio includes medical face masks, respirators, gloves, protective apparel and other infection prevention products. Through our manufacturing, sourcing, logistics and distribution activities, we work with a global network of suppliers, service providers and business partners.

MEDICOM SAS is part of the Medicom Group, a global healthcare company dedicated to improving infection prevention and control while maintaining high standards of social responsibility and ethical sourcing.

3. Our Commitment Against Modern Slavery

MEDICOM SAS recognises that modern slavery can take many forms, including:

- Forced labour
- Debt bondage
- Human trafficking
- Child labour
- Forced or servile marriage
- Exploitative working conditions

We are committed to ensuring that these practices do not occur within our operations or supply chains.

We expect all employees, suppliers, contractors, distributors and business partners to comply with the same ethical standards and to actively support the protection of internationally recognised human rights.

MEDICOM SAS

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4. Governance and Responsibility

Responsibility for preventing modern slavery is embedded within the governance framework of MEDICOM SAS.

Senior management oversees the implementation of ethical sourcing and human rights commitments as part of the organisation's Environmental, Social and Governance (ESG) and Corporate Social Responsibility (CSR) programmes.

Management regularly reviews business risks, supplier performance and compliance activities to ensure that appropriate controls remain effective throughout the organisation and supply chain.

5. Policies Supporting Human Rights

MEDICOM SAS maintains a range of policies and procedures that support our commitment to preventing modern slavery and human trafficking, including:

- Corporate Social Responsibility (CSR) Policy
- Human Rights Statement
- Supplier Code of Conduct
- Whistleblowing and Speak-Up mechanisms
- Ethical sourcing requirements
- Quality and compliance procedures
- Risk management processes

These policies communicate our expectations regarding ethical behaviour, labour standards, human rights, business integrity and responsible sourcing.

6. Supply Chain Due Diligence

MEDICOM SAS applies a risk-based approach to supplier management.

Prior to engaging suppliers, due diligence activities may include:

- Supplier qualification processes
- Review of business and regulatory information
- Assessment of quality systems and certifications
- Review of social and ethical compliance standards
- Evaluation of human rights and labour practices
- Assessment of country and sector-specific risks

Where appropriate, suppliers may be required to acknowledge and comply with the Medicom Supplier Code of Conduct, which includes provisions relating to:

- Prohibition of forced labour
- Prohibition of child labour
- Freedom of association
- Non-discrimination
- Ethical recruitment practices
- Safe working conditions
- Compliance with applicable laws and regulations

MEDICOM SAS reserves the right to perform additional reviews and assessments where elevated risks are identified.

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7. Risk Assessment and Management

MEDICOM SAS periodically assesses risks associated with modern slavery throughout its operations and supply chains.

Risk considerations include:

- Geographic location of suppliers
- Industry sector exposure
- Operational complexity
- Supply chain visibility
- Previous audit findings
- Regulatory developments

Additional attention is given to suppliers operating in higher-risk countries or sectors where labour exploitation risks may be elevated.

Where concerns are identified, corrective action plans, enhanced monitoring or other appropriate remediation measures may be implemented.

8. Supplier Engagement and Monitoring

MEDICOM SAS promotes continuous improvement throughout its supply chain.

Supplier assessment and monitoring activities may include:

- Supplier self-assessments
- ESG and sustainability evaluations
- Quality audits
- Regulatory inspections
- Corrective and preventive action processes
- Ongoing supplier performance reviews

Failure to comply with applicable labour and human rights requirements may result in escalation, remediation requirements or termination of the business relationship where justified.

9. Training and Awareness

MEDICOM SAS recognises that employee awareness is essential to preventing modern slavery.

Training and awareness activities may include:

- Employee induction programmes
- Periodic compliance training
- Procurement and supply chain awareness sessions
- Human rights and ethical sourcing guidance
- Updates regarding relevant legislation and best practices

Employees are encouraged to report any suspected instances of misconduct, unethical behaviour or human rights violations through appropriate reporting channels.

10. Measuring Effectiveness

To measure the effectiveness of our actions, MEDICOM SAS monitors a range of indicators where applicable, including:

- Number of supplier assessments completed
- Number of supplier audits conducted
- Percentage of strategic suppliers acknowledging the Supplier Code of Conduct
- Completion rates for employee awareness training
- Number of reported concerns relating to labour and human rights issues
- Corrective actions implemented and closed
- ESG and sustainability performance indicators

These measures support continuous improvement of our modern slavery prevention programme.

11. Continuous Improvement

MEDICOM SAS is committed to continuously strengthening its approach to human rights due diligence and ethical sourcing.

Future priorities include:

- Further improvement of supply chain transparency
- Enhancement of supplier sustainability assessments
- Expansion of ESG-related performance monitoring
- Ongoing employee training and awareness initiatives
- Continued alignment with evolving customer, regulatory and stakeholder expectations

Sandrine ENGELS

Présidente Europe

MEDICOM SAS

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