Modern Slavery Act Statement and Policy

This is a voluntary statement prepared by Orthomotion Medical Ltd (company no. 08234674) "Orthomotion". While the obligations of section 54 of the Modern Slavery Act 2015 do not currently apply to Orthomotion, we recognise the importance of its principles and have prepared this policy statement to demonstrate our commitment to them. This statement has been approved by the Orthomotion board.

Orthomotion is a Medical Device 3rd Party Logistics Service supplier and Distributor. We are based in Lancashire in the UK, which is our only facility. We supply product on behalf of our clients to their customers in accordance with our clients' specific instructions.

Orthomotion is strongly opposed to human trafficking, slavery, debt bondage and child labour and supports efforts to eradicate such practices. Orthomotion would never knowingly conduct business with customers, clients, contractors or suppliers engaged in such practices.

Given the nature of the types of products, Orthopeadic implants, and services we provide, it is our assessment that our business activities present little risk of promoting human trafficking and slavery. With respect to these issues, the Supply Chains Act of 2010 (the "Act") requires certain manufacturers and retailers, including Orthomotion, to disclose their efforts to eradicate human trafficking and slavery from their supply chains. The Act requires disclosure in five (5) areas: audits, verification, certification, training, and internal accountability.
At this time, Orthomotion requests information from each client or supplier as to its modern slavery policy and reviews the paperwork where available but does not perform official audits or independently verify its product supply chain or its direct suppliers for risks relating to human trafficking or slavery.

According to the Orthomotion Code of Conduct and our contractual arrangements with suppliers, our suppliers are required to comply with applicable laws and regulations governing their business practices. Failure to comply with these contractual requirements constitutes breach of contract, but there is no separate certification process specifically for slavery and human trafficking. Orthomotion has incorporated information on addressing the potential for human trafficking or slavery in its supply chain into our regular training curriculum for employees and management with direct responsibility for supply chain management.

The recruitment and employment of Orthomotion employees adheres to all applicable regulations, local and national laws. We also commit to paying at least the statutory minimum living wage and at least the statutory minimum pension contribution to all employees at Orthomotion as decided by the UK government.

Orthomotion also promotes that its employees and personnel within the supply chain should have;

- • Freedom to terminate employment.
- • Freedom of movement.
- • Freedom of association.

Orthomotion also promotes that within its capabilities it;

- • prohibits any threat of violence, harassment and intimidation.
- • Prohibits the use of worker-paid recruitment fees.
- • Prohibits compulsory overtime.
- • Prohibits child labour.
- • Prohibits discrimination.
- • Prohibits confiscation of workers original identification documents.
- • Provides access to remedy, compensation and justice for victims of modern slavery.
- • All workers within our supply chain have the access to trade unions or other forms of worker representation.

All Orthomotion employees are subject to our code of ethics which states that all employees must act honestly, fairly and with transparency. Breach of our code of ethics is subject to disciplinary action.
This statement and policy is publicly available and communicated with all employees and is available to any person working within the supply chain and as such availability will be communicated to.
Any person within the supply chain can express a concern and email the concern to Tony Fennell, CEO of Orthomotion at any time. Orthomotion will respond immediately with a holding email. It will then start and investigation into the alleged issue within 5 working days. If any supplier is found to be in breach of any of this statement and policy, they will be immediately suspended until further investigation can take place. Any results finding the allegation to be correct then the supplier will be reported to the appropriate authorities. Victims will be safeguarded at all times where applicable.



Tony Fennell
Chief Executive Officer