HEMODIA

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Financial year ended 31 December 2026

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1. Introduction and basis of this statement

This statement is made by Hemodia [SAS] ("Hemodia", "we") and sets out the steps taken during the financial year ended 31 December 2026 to prevent modern slavery and human trafficking from occurring in our operations and supply chains.

This statement is published pursuant to section 54 of the UK Modern Slavery Act 2015. Hemodia's annual turnover exceeds the £36 million threshold set out in that section, and the company carries on part of its business in the United Kingdom. The statement has been prepared having regard to the Home Office statutory guidance "Transparency in supply chains: a practical guide" (March 2025).

It covers Hemodia UK, TVA 202853140.

We do not claim that our supply chains are free from the risk of modern slavery. No manufacturer operating global supply chains can credibly make that claim. What we describe below is how we identify that risk, how we act on it, and where our approach still needs to develop.

2. Our organisation

Hemodia is a French manufacturer of medical devices, that designs, manufactures, and markets medical and electromedical devices. The company is headquartered in Toulouse, France, operates 3 production sites and employs 500 people.

We supply hospitals, dialysis centres, distributors and OEM customers in 3 countries, including the United Kingdom.

Our quality management system is certified to ISO 13485 and our products are regulated under the EU Medical Device Regulation. We have been a signatory to the United Nations Global Compact since February 2024, and we are assessed annually by EcoVadis.

3. Our supply chains

Our supply base comprises approximately More than 2,000 suppliers, of which 40 account for 70% of procurement spend. The main categories are set out below.

Category	Nature of goods or services	Principal sourcing regions
Polymers and resins	Medical-grade plastics, tubing, moulded components	[Western Europe]
Electronic components	Sensors, printed circuit boards, connectors	[Europe, East and South-East Asia]
Contract manufacturing	Sub-assemblies and sterilisation services	[Europe, Asia]
Packaging and consumables	Sterile barrier systems, cartons, labels	[Western Europe]
Indirect goods and services	Logistics, cleaning, security, temporary staffing, IT	[France]

Beyond our direct suppliers, our chains extend to polymer production, the extraction and refining of the minerals used in electronic components, and international freight — tiers over which we have no contractual relationship and limited visibility. We treat that limited visibility as a risk factor in its own right rather than as a reason to restrict the scope of this statement.

4. Policies

The following policies govern our approach:

- Ethics Policy — sets out our commitments on human rights, working conditions and business conduct, and is aligned with ESRS G1;
- Anti-Corruption Code — the eight pillars required by the French Sapin 2 Act, including third-party due diligence;
- Code of Conduct — rules on gifts, hospitality and conflicts of interest;
- Responsible Purchasing Policy — ESG requirements applicable to suppliers, including ESG clauses in supply contracts;
- Whistleblowing procedure — confidential reporting channel, with reports acknowledged and handled within one month.

Our policies include an explicit prohibition of forced labour, bonded labour, child labour, the withholding of identity documents, and the charging of recruitment fees to workers, in line with the ILO core conventions and the UN Guiding Principles on Business and Human Rights.

5. Risk assessment

We assess modern slavery risk across our own operations and our supply chains, taking into account sector, geography, workforce vulnerability and the nature of the work performed. Our assessment identifies the following salient risks.

Risk area	Why it is salient	Assessed level
Electronic components sourced from East and South-East Asia	Recognised sector-wide exposure to debt bondage among migrant workers and to recruitment-fee practices	[High]
Contract manufacturing and sterilisation beyond tier 1	Limited visibility of sub-contracting arrangements and of working conditions on site	[High]
Mineral extraction upstream of electronic components	Structural risk of forced and child labour, several tiers removed from our contractual reach	[High]
Temporary and agency labour in our own operations	Vulnerability associated with short assignments, language barriers and reliance on intermediaries	[Medium]
Outsourced cleaning, security and logistics services	Low-margin services frequently sub-contracted, with a workforce exposed to precarious conditions	[Medium]
Direct employment in our French operations	Regulated environment, permanent workforce, employee representation in place	[Low]

This assessment was last reviewed in 2026 and is reviewed annually, or sooner where our sourcing footprint changes materially.

6. Due diligence

The measures below are in place across the supply relationship lifecycle.

- Before entering into a relationship: suppliers are screened against our responsible purchasing risk mapping, which combines country risk, sector risk and supplier criticality.
- At contracting: ESG clauses are incorporated into supply contracts, requiring compliance with our standards and with applicable labour law.

- During the relationship: critical suppliers are assessed [through EcoVadis questionnaires / self-assessment questionnaires], and results feed into supplier reviews.
- Where an issue is identified: our response is remediation-first — we work with the supplier on a corrective action plan and treat termination as a last resort, because disengagement usually worsens the position of the workers concerned.

7. Grievance mechanisms and remediation

Our whistleblowing procedure is available to employees and, where relevant, to third parties. Reports may be made confidentially and are handled within one month. Retaliation against a person making a report in good faith is prohibited.

During the reporting period, no reports relating to forced labour, human trafficking or serious labour rights concerns were received.

8. Training and awareness

Employees in procurement, sales and management functions receive training on business ethics, including 25 employees trained during the reporting period.

9. Measuring effectiveness

We monitor the following indicators. We recognise that these measure activity rather than outcomes, and we intend to develop outcome-based indicators as our programme matures.

Indicator	2026	2027	Target
Share of critical suppliers covered by ESG clauses	50% critical	50% critical and semi critical	100%
Signatory to the Responsible Purchasing Charter	80% critical	80% critical and semi critical	100%
Number of suppliers with an active corrective action plan	In progress	In progress	n/a
Reports received through the whistleblowing channel	0	0	0
Confirmed cases of forced labour or trafficking	0	0	0

10. Objectives for the coming year

- Extend supply chain mapping beyond tier 1 for the electronic components category.
- Deploy a dedicated forced labour awareness module for procurement, quality and logistics teams.
- Open the whistleblowing channel to supply chain workers and communicate it in the relevant local languages.
- Define outcome-based effectiveness indicators.

11. Approval

This statement was approved by the CEO of Hemodia on October 2026 and is signed on its behalf.

Rémi Teulière
CEO
15/10/2026

