MODERN SLAVERY POLICY

March 2026

Intra Medikal Ltd. Modern Slavery Policy

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1. Policy Statement

1.1 Modern slavery is a serious crime and a fundamental violation of human rights. It includes practices such as slavery, servitude, forced labour, and human trafficking, all of which involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

1.2 Intra Medikal Ltd. maintains a zero-tolerance stance on modern slavery. We are dedicated to conducting all business dealings and relationships ethically and with integrity. We are committed to implementing effective systems and controls to prevent modern slavery from occurring within our business and supply chains.

1.3 We strive for transparency in our business practices and in addressing modern slavery within our supply chains, in compliance with the UK Modern Slavery Act 2015 and other relevant legislation, including adherence to NHS supply chain regulations and Procurement Policy Note (PPN) 02/23.

1.4 We expect the same high standards from all contractors, suppliers, and business partners. As part of our contractual processes, we prohibit the use of forced, compulsory, or trafficked labour or any form of slavery, whether involving adults or children. We also expect our suppliers to enforce these standards throughout their supply chains.

2. Scope of the Policy

2.1 This policy applies to everyone working for or on behalf of Intra Medikal, including employees at all levels, directors, officers, agency workers, seconded staff, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

2.2 This policy is not part of any employee's contract of employment and may be amended at any time.

3. Responsibility for the Policy

3.1 The Board of Directors has overall responsibility for ensuring compliance with this policy and with our legal and ethical obligations.

3.2 Senior management is responsible for implementing this policy, monitoring its effectiveness, responding to inquiries, and auditing internal control systems to ensure their effectiveness in preventing modern slavery.

3.3 All levels of management must ensure that their teams understand and comply with this policy. Regular training on modern slavery and its risks within supply chains will be provided.

4. Compliance with the Policy

4.1 All employees and those working under our control must read, understand, and comply with this policy.

4.2 The prevention, detection, and reporting of modern slavery within any part of our business or supply chains is everyone's responsibility. Any activity that may lead to or suggest a breach of this policy should be avoided.

4.3 If you suspect any conflict with this policy, notify your line manager or senior management immediately.

4.4 Concerns about potential issues or suspicions of modern slavery in any part of our business or supply chain should be raised at the earliest opportunity.

4.5 If you are unsure whether a particular action or condition constitutes modern slavery, seek guidance from your line manager or senior management. We encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if those concerns turn out to be unfounded.

4.6 Employees suffering detrimental treatment for reporting in good faith will be protected. Detrimental treatment includes dismissal, disciplinary action, or any other adverse

treatment. If you believe you have been subjected to such treatment, report it to your line manager. If the issue remains unresolved, and you are an employee, raise it formally through our Grievance Procedure.

5. Communication and Awareness

5.1 All staff will receive training on this policy and on the risks of modern slavery in our supply chains as part of their induction. Regular training will be provided as necessary.

5.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners from the outset of our relationship with them.

6. Due Diligence Processes

6.1 To identify and mitigate risks, we have established the following systems:

- Identifying and assessing potential risk areas in our supply chains.
- Mitigating the risk of slavery and human trafficking within our supply chains.
- Monitoring potential risk areas.
- Utilising the UK Government's Modern Slavery Assessment Tool (MSAT) or equivalent internal risk assessments for critical suppliers.
- Protecting whistleblowers.

6.2 We focus on high-risk areas within our supply chains to ensure all stages of production and distribution meet our ethical standards.

7. Supplier Adherence to Our Values

7.1 We have zero tolerance for slavery and human trafficking. To ensure compliance with our values, we implement a supply chain compliance program that includes:

- Risk assessments of our supply chain.
- Adherence to our **Intra Medikal Partnership Code of Conduct**.
- Contractual provisions requiring compliance with the UK Modern Slavery Act 2015 and allowing for contract termination in the event of modern slavery breaches.

8. Effectiveness in Combating Slavery and Human Trafficking

8.1 We use the following key performance indicators (KPIs) to measure our effectiveness:

- Completion of internal audits.
- Use of labour monitoring and payroll systems.
- Level of communication and understanding with our suppliers regarding our expectations.

9. Annual Review and Publication

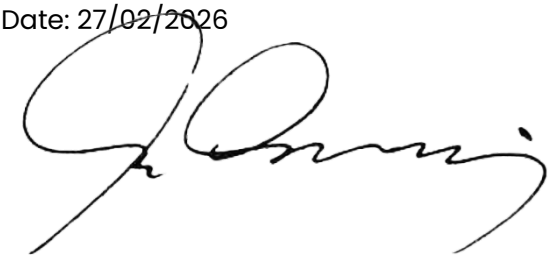
9.1 The Board of Directors will review this policy annually and may amend it as needed.

9.2 This policy will be published on our website and made available upon written request.

9.3 In accordance with our National Modern Slavery Laws, we will also publish an annual statement on our website detailing the steps taken to prevent slavery and human trafficking in our business and supply chains.

10. Breaches of this Policy

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may also terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Signed on behalf of Intra Medikal Ltd.:

Kahraman Deniz - CEO
Date: 27/02/2026