Modern Slavery and Human Trafficking Statement

THD (UK) Ltd, Rev 01-2026

Financial Year: 2026

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and sets out the steps THD (UK) Ltd has taken to ensure that modern slavery and human trafficking are not taking place within its business or supply chains.

THD (UK) Ltd is not currently required to publish a statement under section 54 of the Modern Slavery Act 2015 because its annual turnover is below the statutory threshold. Nevertheless, the company has chosen to publish this statement voluntarily as a matter of good governance, transparency and ethical business practice.

Business and Operational Structure

THD (UK) Ltd is a subsidiary of THD S.p.A., with the Headquarters based in Italy, Correggio (RE).

THD (UK) Ltd operates as a UK-based commercial medical-technology organisation providing services and solutions within the healthcare sector. Our business model is based on delivering medical devices and services to the NHS and commercial customers through directly employed staff and third-party suppliers and subcontractors where specialist capability or scale is required.

THD's highest selling products include procedures for the treatment of haemorrhoids, and the self-illuminating proctoscope range. In terms of individual hospitals that order this haemorrhoids procedure, we service about 300 hospitals; for the proctoscopes we sell to about 450 hospitals.

We work with customers solely in the UK, with a supplier base that includes both UK and international organisations. These suppliers operate mainly in the sectors of manufacturing and medical technology services, and Information Technologies.

This statement applies to THD (UK) Ltd only and does not currently cover any subsidiary or affiliated legal entities. Should the scope of the business expand, this statement will be reviewed and updated accordingly.

For the purposes of the Modern Slavery Act 2015, THD (UK) Ltd would like to voluntarily report our annual turnover of £3.5 million in 2025. This is below the current threshold of £36 million needed to be caught under the act.

For reputational and governance purposes, this voluntary disclosure is intended to align with the structure and expectations applicable to organisations that are legally required to report under the Act, while remaining proportionate to the size, scale and risk profile of THD (UK) Ltd.

Our workforce consists primarily of permanent employees. We also engage a number of suppliers and subcontractors to support business operations. Our suppliers range from small UK-based enterprises to larger international organisations.

Areas of Higher Risk

Based on the information currently available, THD (UK) Ltd considers its direct operational exposure to modern slavery risk to be relatively low.

However, the company recognises that no business can eliminate risk entirely and that potential exposure may arise through temporary labour, recruitment activities, outsourced services, indirect suppliers and wider medical technology supply chains. THD (UK) Ltd has therefore engaged Unseen, a UK charity specialising in modern slavery prevention, to support a more structured assessment of supplier risk (Registered Charity Number 1127620). Findings from this work will inform future due diligence, monitoring and reporting.

A potential risk area would be the use of temporary or agency staff. At present all staff within the sales team, warehouse, and office are on permanent contracts. However, very occasionally we use temp warehouse staff, but from reputable companies.

All recruitment checks are carried out on permanent members of staff including checking their right to work in the UK. Temporary staff members are checked via the recruiter.

Governance Structure

Responsibility for preventing modern slavery and forced labour sits with senior management at THD (UK) Ltd. Oversight is provided by the Managing Director, who holds overall accountability for ethical standards, compliance with applicable law and the approval of this statement. HR is responsible for recruitment controls, right-to-work

checks and worker protections. Operational and procurement management are responsible for supplier due diligence, supplier monitoring, escalation of concerns and implementation of any required remediation actions.

Day-to-day responsibility for implementation and monitoring sits with operational management (Operations Lead), who report directly to senior leadership. Relevant issues are escalated as required, and decisions relating to supplier risk or remediation are taken at senior management level.

Modern slavery risks and any related concerns are escalated to senior management. Where an actual or potential issue is identified, THD (UK) Ltd will assess the concern, determine appropriate remedial action, and, where necessary, engage with suppliers, advisers, charities or competent authorities to protect affected individuals and mitigate further risk.

Operational Due Diligence

THD (UK) Ltd is committed to identifying and mitigating the risk of modern slavery within its operations.

Our due diligence processes include:

- Pre-employment checks to confirm right to work in the UK for all members of staff including temporary members.
- Use of same reputable recruitment agencies which carry out their own checks.
- Contractual obligations requiring compliance with employment and labour laws
- Annual internal reviews of workforce practices
- Maintenance of documented recruitment, grievance and whistleblowing procedures designed to help identify and escalate concerns relating to labour exploitation, forced labour or unethical employment practices.

Risk-based review of suppliers and labour providers, including additional checks where the nature of the service, geography, labour profile or other risk indicators justify enhanced due diligence.

Risk Management Within Our Operations

We manage operational risk through:

- Staff induction and ongoing training, including awareness of ethical standards and acceptable workplace behaviour. We have already implemented a specific modern slavery training module that all employees must complete, and any future members of staff will have to complete at induction. All training modules have refresher courses to keep staff up to date and aware of all situations.
- We are committed to the Employers Pay Principle
- Clear grievance and whistleblowing mechanisms allowing employees to raise concerns confidentially and without fear of retaliation. These procedures are outlined in our handbook
- HR oversight of employment terms, pay, and working conditions. THD (UK) Ltd carry out annual checks every April to assure we align with current minimum wage limits across the age categories. THD (UK) Ltd also pay above minimum wage.
- Recruitment through reputable agencies which we expect to follow due diligence.

Clear escalation expectations for managers where any indicator of modern slavery, worker exploitation or unethical labour practice is identified.

Annual operational risk assessments are conducted periodically, focusing on labour practices, recruitment methods, and reliance on third-party labour providers. There have been no modern slavery risks identified to date.

Going forward, THD (UK) Ltd will maintain records of modern slavery training completion, any concerns reported, investigations undertaken and corrective actions implemented, to support annual review and continuous improvement.

Procurement and Supply Chain

THD (UK) Ltd works with a limited but diverse supplier base, including suppliers of:

- Labour and recruitment services
- Professional and technical services
- Goods and materials

- IT and operational support services

Our main supplier of goods is THD S.p.A. which is based in Italy, Correggio (RE). THD's focus is on colorectal products ranging from haemorrhoid treatments to diagnostic aids. At present our portfolio consists of:

- THD Slide – Haemorrhoid artery ligation procedure for the treatment of piles
- THD Lightscopes – Self-illuminating proctoscopes and retractors
- THD Sphinkeeper – Artificial anal sphincter
- THD Anopress – Anal manometer
- THD EAUS – Endoanal ultrasound
- THD Minicam - Digital videoanoscopy
- THD HR Station & Laser – High Resolution Anoscopy for AIN / Anal cancer surveillance and treatment
- THD Levorag – Topical treatment for anal fissures

Most other suppliers are UK-based.

Higher-Risk Areas in the Supply Chain

Based on current information, THD (UK) Ltd considers its direct supply chain exposure to be relatively lower than sectors with extensive low-cost or high-volume labour sourcing. However, THD (UK) Ltd recognises that the medical devices sector can involve complex manufacturing, logistics, packaging, distribution and service supply chains. For this reason, THD (UK) Ltd has implemented a supplier risk-assessment process supported by Unseen and reports material findings and any related actions in the process itself.

THD acknowledges that there is generally a high-risk associated with the manufacturing and supply chains of the medical devices industry. However, THD (UK) products are manufactured in Italy at the THD S.p.A. Headquarters (a low-risk area), and directly shipped to the UK.

THD (UK) Ltd will continue to enhance visibility beyond tier-one suppliers where this is reasonably practicable and proportionate, particularly where supplier assessments identify increased risk.

Supplier Due Diligence

We apply due diligence throughout the supplier lifecycle:

Selection and Onboarding

- Assessment of supplier reputation and capability
- Confirmation of legal compliance and right-to-work practices:
    - Specific modern slavery checks will be incorporated into supplier due diligence on a risk-based basis. These checks may include confirmation that workers are freely able to leave employment, workers are paid at least the applicable minimum wage, working hours are reasonable and lawful, no child labour is used, identity documents are not withheld, recruitment fees are not charged to workers, and effective grievance mechanisms are available
- Agreement to comply with our ethical standards.
    - Where appropriate, supplier agreements and onboarding requirements will include modern slavery compliance clauses, notification obligations, and rights to request information or conduct further review where concerns arise.

Ongoing Management

- Following completion of the Unseen supplier risk assessment, THD (UK) Ltd will engage with suppliers where potential risk indicators are identified. THD (UK) Ltd will carry out proportionate annual supplier reviews and enhanced due diligence where justified by the supplier risk profile, including escalation to senior management where concerns are identified
- We ask that all suppliers notify THD (UK) Ltd of any labour-related issues. None so far have been reported.
- If a supplier fails to cooperate with reasonable due diligence requests or fails to address identified concerns, THD (UK) Ltd will consider appropriate action, which may include corrective action plans, additional monitoring, suspension of new business or termination of the supplier relationship, subject to the need to avoid causing harm to affected workers.

Supplier selection criteria and requirements are overseen by senior management, with procurement and operational teams responsible for implementation.

Responsibility for reviewing and corroborating supplier statements and evidence sits with senior management.

Workforce in the Supply Chain

Our supply chain workforce in Italy mainly includes directly employed staff (around 97%) with a minority of temporary workers. THD (UK) is a subsidiary of THD S.p.A. and they have ultimate leadership over their Italian workforce and that of the UK.

THD (UK) Ltd will seek to obtain and review relevant information from other key suppliers where appropriate to corroborate labour standards, workforce protections and compliance with applicable employment legislation.

Audits and Monitoring

At present, THD (UK) Ltd has not identified confirmed instances of modern slavery within its supply chain.

No supplier audits have been completed during the reporting period. THD (UK) Ltd can use the outcomes of the Unseen risk assessment to determine whether targeted supplier reviews, further information requests or audits are required. This risk-based approach is intended to provide proportionate oversight while focusing resources on areas of greatest potential exposure.

We recognise the importance of monitoring beyond tier one suppliers and continue to develop our approach in this area.

Monitoring activity will be documented and reviewed annually by senior management as part of the company's modern slavery governance process.

Supplier Expectations and Codes of Conduct

THD (UK) Ltd expects all suppliers to adhere to ethical labour practices and comply with applicable laws.

Suppliers are expected to:

- Prohibit forced, bonded, or child labour
- Ensure workers are treated fairly and paid lawfully

- Maintain safe and respectful working conditions
- Commit to the Employers Pay Principle
- Secure legal minimum standards for all employees

Not charge recruitment fees to workers or require workers to lodge deposits, identity documents or other security as a condition of employment.

Maintain effective and confidential grievance channels for workers and cooperate with THD (UK) Ltd in the investigation and remediation of any credible concern.

THD (UK) Ltd is developing a formal Supplier Code of Conduct to consolidate these expectations and support consistent supplier communication and monitoring.

Training and Awareness

THD (UK) Ltd recognises the importance of awareness in preventing modern slavery. The company has implemented a modern slavery training programme, and all employees have completed the module. New employees will be required to complete the training as part of induction, and refresher training will be maintained periodically to support ongoing awareness.

Employees are encouraged to raise concerns through internal reporting and grievance mechanisms as documented in our employee's handbook. Indicators of modern slavery are considered as part of broader operational and supplier risk management.

Training completion and any modern slavery-related concerns raised through internal channels will be monitored and reviewed annually.

Measuring Effectiveness

THD (UK) Ltd will assess the effectiveness of its modern slavery controls using proportionate key performance indicators (KPI), including employee training completion rates, number and proportion of suppliers assessed, number of concerns raised, investigations undertaken, corrective actions implemented, and outcomes of any supplier reviews or audits.

These measures will be reviewed annually and used to inform improvements to due diligence, training, supplier engagement and reporting.

Approval

The statement will be reviewed at least annually and earlier if there is a material change to the business, supply chain, legal requirements or identified risk profile.

This statement has been approved by senior management of THD (UK) Ltd and will be reviewed and updated annually.

Signed

Name: FILIPPO BASTIA

Role: THD UK Board of Director Member

Date: 14/07/26