

# MCT Lifesciences Ltd

## Modern Slavery Policy – 2025

### **Policy Statement**

Modern slavery is a severe violation of human rights and includes slavery, servitude, forced or compulsory labour, and human trafficking. MCT Lifesciences Ltd has a zero-tolerance approach to modern slavery and is committed to ethical, transparent, and responsible business operations. We maintain strong systems and controls to ensure modern slavery does not occur within our operations or our supply chain.

This statement covers the financial year ending 30 April 2026 and is made pursuant to the UK Modern Slavery Act 2015.

### **Our Business and Supply Chain**

MCT Lifesciences Ltd is a UK-based distributor of medical devices, supplying products to the NHS and private healthcare providers. Our supply chain includes manufacturers and logistics partners primarily located in Europe and Türkiye. We recognise that some sectors and geographies may present elevated modern slavery risks and apply enhanced due diligence where appropriate.

### **Scope**

This policy outlines the steps taken by MCT Lifesciences Ltd to prevent modern slavery and demonstrates compliance with NHS Supply Chain's Responsible Procurement expectations, including MSAT and Evergreen obligations, in a concise format suitable for tender submissions.

## **Key Provisions**

- Prohibition of forced, bonded, indebted, or trafficked labour.
- Prohibition of recruitment fees—no worker should ever pay for a job.
- Prohibition of child labour and all forms of exploitation.
- Protection of workers' freedom of movement and association.
- Prohibition of withholding identity documents.
- Ensuring fair treatment, non-discrimination, and no retaliation.
- Requirement that suppliers cascade these principles throughout their supply chains.

## **Responsibilities**

Overall responsibility for implementing and updating this policy lies with the Director. All managers are responsible for ensuring their teams understand and follow the policy. The Procurement and Compliance functions ensure appropriate due diligence, monitoring, and documentation.

## **Supply Chain Due Diligence**

We undertake risk assessments considering:

- Country risk
- Sector risk
- Recruitment practices
- Supplier modern slavery policies
- ISO certifications and audit reports
- Supply chain transparency

All new suppliers must confirm compliance with this policy before engagement. Contractual clauses prohibit modern slavery and allow termination for non-compliance.

## **MSAT and Evergreen Commitments**

MCT Lifesciences participates in the NHS Supply Chain Modern Slavery Assessment Tool (MSAT) and the Evergreen framework, updating evidence annually.

## **Supplier Expectations and Monitoring**

Suppliers are required to:

- Confirm compliance with this policy and the Modern Slavery Act.
- Provide documentation when requested.
- Support audits or enhanced due diligence if identified as medium or high-risk.
- Cascade anti-slavery requirements to their own suppliers.

## **Training and Awareness**

All employees receive modern slavery training at induction and annually.

Training includes:

- ILO indicators of forced labour
- How to identify risk
- Reporting procedures
- Ethical recruitment standards

Training resources may also be shared with suppliers where appropriate.

## **Reporting and Grievance Mechanisms**

Concerns may be reported anonymously via:

- Email to the Director
- Internal reporting channels

Reports are handled confidentially. We do not tolerate retaliation against individuals raising concerns in good faith.

## **KPIs and Monitoring**

We monitor compliance through:

- Annual training completion rates
- Supplier compliance and documentation
- Number of reported incidents
- Audit results
- Risk review frequency

## **Continuous Improvement**

This policy is reviewed annually or following regulatory changes. We seek to collaborate with industry initiatives and NHS programmes to strengthen our practices.

## **Breach of Policy**

Breaches by employees result in disciplinary action. Supplier breaches may result in contract termination.

## **Approved by:**

Murat Celebi

Director, MCT Lifesciences Ltd

Approval Date: 01/05/2025

## **Website Publication**

This statement is published at: <https://www.mctlife.co.uk/legal-notice>