

**Guardian**

11 Ladywell Avenue
Grangestone Industrial Estate
Girvan
Ayrshire
KA26 9PF
United Kingdom

t: +44 (0) 1465 714848
f: +44 (0) 1465 714438
e-Mail: info@guardiansurgical.com
www.guardiansurgical.com

Rociale

Cwm Cynon Business Park (North)
Mountain Ash
Rhondda Cynon Taff
South Wales
CF45 4ER
United Kingdom

t: +44 (0)1443 471 300
f: +44 (0)1443 471 308
e-Mail: info@rocialle.com
www.rocialle.com

Rociale Healthcare Limited Modern Slavery Statement
for the financial year ending 31 December 2019

Introduction

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and is the statement of Rociale Healthcare Limited and its subsidiaries within the UK for the financial year ending 31 December 2019. This statement details the steps taken by Rociale Healthcare Limited and its subsidiaries within the UK to prevent slavery, servitude and forced or compulsory labour; and human trafficking taking place in any part of their business or their supply chains.

Rociale Healthcare Limited is fully aware of and committed to its legal and moral obligations towards preventing forced, bonded or compulsory labour and human trafficking.

Hence, Rociale Healthcare Limited is committed to improving its practices with regard to the fight against modern slavery and human trafficking.

Company supply chain

The supply of goods, services and products to the Company business units is managed by the procurement department. The procurement function deals with corporate social responsibility (“CSR”) in order to assist with selecting business partners.

Although the Company’s main business locations are in Europe, the Companies sources goods globally, particularly from the Indian subcontinent and Asia.

Important work is being carried out to rationalise the Company’s panel of business partners. This work should facilitate the implementation of ethics values, including in regard to the fight against modern slavery and human trafficking.

Assessment of Modern Slavery risk within our business

The Company believes that the main risks regarding modern slavery relate to the business partners, especially suppliers in higher risk jurisdictions.

Rociale and Guardian are trading divisions of Rociale Healthcare Ltd.

Registered Office: Cwm Cynon Business Park, Mountain Ash, Rhondda Cynon Taff, South Wales. Registered in England, No. 11965323

The Company's supply chain is procured through the purchasing and procurement department working in conjunction with the Chinese procurement team. Concentrating the procurement of goods and services within one team results in better oversight of the Company's supply chains. Furthermore, it ensures that the procurement process is carried out by a team who is duly trained and skilled in relation to ethical and responsible purchasing.

On that basis, the Company ranks, assesses and manages the risks in relation to ethics by focusing on the higher risk countries from which they source products and textiles. The Company therefore focuses on the sourcing efforts in the Indian subcontinent and Asia in relation to suppliers selected by the Company.

Policies in relation to slavery and human trafficking

The Company has a zero-tolerance policy towards any breach of human rights, including modern slavery and human trafficking.

The Company is committed to operating in accordance with the law and to promote the highest standards of integrity and share its values with employees and business partners.

The Company's Charter on Responsible and Ethical Purchasing, sets out its expectations of their business partners (such as suppliers) in relation to ethics, including in respect of human rights.

This Charter on Responsible and Ethical Purchasing requires business partners to undertake to comply with its terms and therefore limit their environmental impacts, work for sustainable development and act ethically.

Specifically, this Charter requires the Company's business partners to:

- recognise and respect the protection of internationally proclaimed human rights;
- abide and work in line with the United Nations Global Compact principles on human rights and labour;
- take part in the fight against any kind of corruption including extortion, bribery, influence peddling and facilitation payments;
- ensure the provision of a safe working environment for employees;
- **strictly prohibit the use of child labour or any form of slavery, forced labour and human trafficking;**
- ensure labour conditions are fair, employees are paid a regular salary in accordance with their employment contracts and the law, and all legal requirements are complied with; and,
- prevent any form of discrimination based upon any distinction such as race, gender, age, ethnicity, political opinion, origin etc.

Due Diligence and management of modern slavery risk

The Company supports the implementation of their global policy with their business partners, mainly suppliers, through audits that may be carried out either directly by the Company or with the help of any independent audit company. These audits are intended to check that business partners are properly applying the Company's ethics principles.

In order to ensure the efficiency of audit operations, the Company is implementing an audit methodology which mainly comprises the following elements:

- the establishment of objective and explicit criteria to assess how strategic a business partner is to the Company;

- an evaluation of the business partners with respect to CSR (through reference to international norms such as ISO26000 or SA8000 or through compliance with international auditing standards such as SEDEX/SMETA, BSCI)

The process also enables the Company to optimise their business partner audit process by defining and prioritising the audit operations.

If, on completion of an audit, a business partner is found not to be in compliance with the Company's ethical principles, a business partner may be given the opportunity to define and implement necessary corrective actions. Alternatively, the Company may terminate their business relationship with such a business partner and/or exclude that partner from invitations to tender.

Monitoring effectiveness

To date in 2019, the Company has conducted 5 audits at business partner premises. These audits did not reveal any serious compliance breach.

No concerns relating to modern slavery were raised through audits in 2019.

Training

It is important that the Company's staff are aware of and understand the risks of slavery and human trafficking. Staff must be able to identify signs of slavery and human trafficking and be aware of what action to take if such activities are suspected. The Company will, therefore, consider training opportunities at appropriate levels within the UK.

Further steps and monitoring

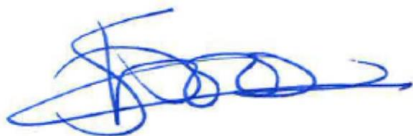
The Company is aware of the pernicious nature of modern slavery and therefore understands that the steps the Company takes regarding risk associated with modern slavery should not be static. The Company will continue to monitor operational practices, review its approach and continue to build on this in the year ahead.

The Company has identified the following as key actions for 2019:

- continuing review of strategic business partners.

This statement was approved by the Rociale Healthcare Limited Senior Management team for and on behalf of itself.

Signed

A handwritten signature in blue ink, appearing to be "Simon Loose".

Simon Loose

Chief Executive Officer