

Slavery & Human Trafficking Statement

2024

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1. THE ORGANISATION AND SUPPLY CHAIN

BHA Medical Limited is a leading healthcare solutions provider that operates across multiple markets and geographies. We fundamentally care about our clients and their specific needs in this everchanging landscape, and our level of service represents this as we consistently go above and beyond our client's expectations. We commit to providing innovative solutions through the sourcing and distribution of technology, products and services in Health and Wellness to make sure everyone has access to quality, affordable, convenient, and accessible healthcare.

BHA Medical Limited sources medical equipment, products and technology directly from various manufacturers around the world and supply to both distributors and end-users. Our leading supply is from USA, Italy and China.

We fulfil orders through our own warehouse but make use of courier companies when delivering to customers. Certain orders are fulfilled via selected supplier fulfilment centres.

2. DEFINITION AND POLICY STATEMENT

Modern slavery is a violation of basic human rights and is a major crime. It takes various forms which include slavery, servitude, forced and compulsory labour and human trafficking, all of these deprive a human's fundamental rights in order to exploit them for commercial or personal gain.

BHA Medical has adopted a zero-tolerance approach to modern slavery and is totally committed to acting ethically, with integrity and transparency in all relationships both business and personal and has implemented effective systems, measurements, and controls to ensure modern slavery is not taking place within the business in line with the obligations as set out in the Modern Slavery Act 2015.

BHA Medical is also committed to enforcing modern slavery policies through its supply chain and expects the same standards from manufacturers, contractors and business partners alike. To this end, our on-boarding procedures sets out our expectations and requires commitment to adhering to our modern slavery policies.

3. RESPONSIBILITY FOR THE POLICY

Responsibility Level	Who?	What?
Ultimate Responsibility	BHA Medical Board of Directors	Enforcement of policies by all employees, partners, and contractors.
Day-to-day Responsibility	Group Compliance Officer	<ul style="list-style-type: none"> • Drafting policies • Implementation within the organisation and supply-chain • Monitoring • Risk assessment • Auditing and Reviewing • Reporting • Investigating allegations
Training	Line Managers	<ul style="list-style-type: none"> • Training / educating • Implementing <p>Staff within their divisions.</p>

4. COMPLIANCE WITH THE POLICY

It is the responsibility of all permanent, casual and contracted employees of BHA Medical as well as anyone under the company's control to abide by these policies which includes the prevention, detecting and reporting both within the UK or abroad. All individuals mentioned above are required to avoid any activity that will breach this policy.

All individuals are encouraged to raise concerns if there is any suspicion of breach or conflict of this policy within the company or the supply chain. Report immediately to the Group Compliance Officer of BHA Medical. Contact details are as follows:

Ashley Rose	Group Compliance Officer	compliance@bha-medical.com	+27 83 778 5551
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Anyone who raises a concern will not suffer any detrimental treatment or victimisation if any issue is reported in good faith even if it is a mistake.

5. BREACH OF THE POLICY

Any permanent, casual, and contracted employee found to be in breach of this policy will face disciplinary action and a guilty verdict will result in gross misconduct and will face summary dismissal. Any business relationship with a manufacturer, contractor and business partners will be terminated immediately.

6. TRAINING AND COMMUNICATION

BHA Medical is committed to communicating this policy to all individuals annually and as part of the induction / orientation pack for all new permanent, casual, and contracted employees. In addition, our existing supply chain; manufacturers, contractors and business partners are reminded of our policy annually and new organisations as part of our on-boarding procedures.

Slavery & Human Trafficking Statement approved by:	
Signature:	
Full Name:	Michael Hough
Position:	Director
Year:	2024