

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 March 2024.

Primel Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

## Organisational Structure

Primel Ltd has business operations in the United Kingdom.

We operate in the healthcare sector. The nature of our supply chains is as follows: We work with UK supply sources for our products, customer, IT and financial services which we require to demonstrate adherence to the Modern Slavery Act 2015.

For more information about the Company, please visit our website: <https://www.primel.com>.

## Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Recruitment and selection policy - We require evidence that all our employees are eligible to work in the UK and have not been subject to human trafficking or supplied via agencies that are may be subject to debt bondage, forced labour or other exploitative tactics. We also require evidence of our suppliers recruitment policy in adhering to the Modern Slavery Act, 2015.
- Supplier code of conduct - We seek to ensure that our suppliers are fully conversant and operate in accordance with the Modern Slavery Act, 2015 for its employees and suppliers.
- Whistleblowing policy - We operate an open policy with our employees that creates transparency for staff in understanding our policies and procedures, enabling them to express concerns in their working environment without fear of reprisal.
- Staff code of conduct - Our Code of conduct demonstrates our intent to provide a fair and open working environment with equal opportunities and tolerance at the core of our company values, whilst upholding a clear stance of zero tolerance concerning Modern Slavery
- Procurement policy - Our procurement policies and procedures are designed to ensure that our suppliers adhere to the requirements of the Modern Slavery Act, 2015 by assessing their policies and procedures before and during the supply of goods and services for Primel Ltd.
- Safeguarding policy - Our policy is designed to identify potential risks of modern slavery to staff which includes identifying potential risks and methods of reporting.

We make sure our suppliers are aware of our policies and adhere to the same standards.

## Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide protection for whistleblowers.

## Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because our business is UK based with an associated supply chain that is in low risk industries, such as innovative technology in antimicrobial disinfection for healthcare..

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

## Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 12 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.
- We will carry out a regular audit of suppliers - 100% of suppliers each year.

## Training Staff

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the Company.
- What external help is available.
- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.

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Arjun Luthra, Chief Executive,  
Primel Ltd

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Date     18/06/25