Modern Slavery and Human Trafficking Statement

Dornier MedTech UK Ltd

Inaugural statement · period 21 July 2026 to 31 August 2026 · published voluntarily

1 · Status of this statement

This is the first Modern Slavery and Human Trafficking Statement of Dornier MedTech UK Ltd, company number 17352346, registered office 5 Churchill Place, 10th Floor, London E14 5HU.

Dornier MedTech UK Ltd **is not required to publish a statement under section 54 of the Modern Slavery Act 2015**. The company was incorporated on 21 July 2026, has not yet completed a financial year, and its turnover is below the GBP 36 million threshold at which the duty applies. We publish this statement voluntarily, because the risk of modern slavery does not depend on a company's turnover and because our customers in the National Health Service are entitled to know how a new supplier manages it.

This statement covers the period from incorporation to the date of board approval below. A statement for the financial year ending 31 March 2027 will follow within six months of that year end, and annually thereafter.

We set out below both what we have done and what we have not yet done. A first statement that describes only intentions would be of no use to the reader.

2 · Our organisation and our supply chains

Structure

Dornier MedTech UK Ltd is a wholly owned subsidiary within the Dornier MedTech group, an international medical technology business focused on urology and part of Advanced MedTech Holdings. The wider group reports more than 500 employees and a presence in more than 100 countries.

Our activities in the United Kingdom are the distribution, rental and leasing, installation, servicing and repair of medical laser and lithotripsy systems, and the supply of associated consumables. Our customers are NHS trusts, private hospitals, surgical centres and urology practices. We do not manufacture in the United Kingdom.

Our supply chains

Our supply base has two parts, and they carry different risks.

- Product. Devices, laser fibres, endoscopes, single-use consumables and spare parts are supplied to us intra-group. Dornier MedTech UK Ltd. does not source finished product from third parties.
- Operational goods and services. Freight and customs clearance, warehousing, facilities management and cleaning, security, information technology, professional services, and agency or subcontracted labour where used. These are bought locally and form the labour-intensive part of our supply base.

We have mapped our supply chain to the first and second tier. The second tier is the manufacturing supply base behind our intra-group product supply, where components such as electronic assemblies and precision optics originate. Extending the depth and documentation of that view is a continuing priority.

3 · Policies relating to modern slavery

We apply the Dornier MedTech Supplier Code of Conduct, the Supplier Guidelines and the Dornier Terms and Conditions of Purchase. Acceptance of the Supplier Code of Conduct is a condition of supply, and suppliers confirm it before any commercial relationship begins.

The Supplier Code of Conduct is built on the principles of the UN Global Compact and the core labour standards of the International Labour Organization. It requires adherence to international, national and local law, and it addresses:

- freedom of workers to terminate employment, freedom of movement, and freedom of association
- prohibition of child labour and of discrimination
- prohibition of any threat of violence, harassment or intimidation
- prohibition of worker-paid recruitment fees
- prohibition of compulsory overtime
- prohibition of the confiscation of workers' original identification documents

One provision is not yet present: access to remedy, compensation and justice for victims of modern slavery. We have asked for it to be added, and we say so here rather than leave the reader to assume the Code is complete.

The Supplier Code of Conduct is published at https://www.dornier.com/supplier-information/. Our policies are approved at group senior management level, are available to our employees, and applicable policies are communicated to our suppliers.

4 · Risk assessment

Risk does not mean that modern slavery is occurring. It identifies where enhanced scrutiny is warranted.

We have assessed our supply base by category, country and the nature of the work involved. The categories we regard as carrying the greatest inherent risk are the goods we supply for resale and the services we sell, because both depend on manufacturing and service inputs we do not perform ourselves.

On a geographic basis we identify China as a higher-risk location in our supply chain. Our products are supplied to us from within western Europe, but the manufacturing supply base behind it includes electronic and optical components of Chinese origin, and international assessments consistently identify a higher prevalence of forced labour in electronics manufacturing in that market. Naming it is a statement of where we intend to look harder, not an allegation against any individual supplier.

We have not identified any individual supplier that we assess as being at high risk of modern slavery. We do not present that as a conclusion about every level of our supply chain, and it would be misleading to do so. Visibility diminishes with depth, and the categories in which forced labour is most prevalent globally — electronics and component assembly, metals, and mineral extraction and refining — sit furthest from us.

We have also assessed whether our own purchasing behaviour could create pressure on suppliers that leads to poor labour practice. We have examined late high-volume ordering, forecast accuracy and payment timeliness. We have not yet examined pricing that fails to reflect sustainable production costs, short lead times, late contract withdrawal, penalties following late specification changes, or specification accuracy. We intend to complete those in the coming period.

5 · Due diligence

Modern slavery risk is considered at every stage of our procurement process: identifying a need, defining the requirement, evaluating tenders, awarding a contract, managing the contract in life, and reviewing it at the end. All suppliers are obliged to sign the Dornier Code of Conduct before any interaction takes place.

Supplier assurance operates within our quality management system. Suppliers are qualified before appointment, evaluated annually, and audited by our quality management teams on a risk-based basis. Certification to ISO 13485 and MDSAP, and conformity with the Medical Device Regulation, the Medical Devices Directive, quality assurance agreements and the relevant country-specific requirements, include checks on Code of Conduct compliance, and the same is verified during our annual supplier evaluation. Where a supplier fails to meet a requirement, we may require improvement, increase monitoring, or exercise our contractual rights.

We are clear about what these audits are and are not. They are quality and regulatory audits that include verification of Code of Conduct compliance. They are not social audits of labour conditions carried out by an independent party. No social audit of labour conditions has been carried out, and extending audit scope to labour standards is an objective for the coming periods.

Where recruitment agencies or labour providers are used, we screen and evaluate them before any placement, we have integrated these safeguards into our policies, and we brief the staff who appoint such providers on the risk of debt bondage arising from recruitment. We do not yet operate a formal ongoing monitoring programme for labour providers; establishing one is on our priority list below.

No incidence of modern slavery has been recorded or uncovered in our organisation or our supply chain in the past twelve months, and no labour rights issue has been identified through supplier evaluation or audit.

6 · Our own workforce and recruitment

Our direct workforce in the United Kingdom presents a lower inherent risk than parts of our extended supply chain, but no workplace is risk free. We verify identity and right to work, issue written terms of employment, pay lawful wages directly to the worker, observe working time law, and place no restriction on a worker's freedom to leave employment subject to lawful notice.

No worker is required to pay a fee to obtain or keep work with us, and we do not hold workers' passports or identity documents. Managers must escalate immediately any sign of unexplained wage deduction, document retention, debt, intimidation, restricted movement, tied or overcrowded accommodation, or a third party controlling a worker's communications or pay.

7 · Raising a concern

Anyone may raise a concern about modern slavery in our operations or our supply chain — an employee, a worker, a supplier, a supplier's worker, a customer, or a member of the public. Concerns may be raised through:

- a line manager, or any other manager
- Human Resources, or a director of Dornier MedTech UK Ltd
- the Dornier MedTech group speak-up channel:
    - ethicsline@advanced-medtech.com (goes to a Committee: ARC Chairman, AMTH President & CEO, VP HR, VP Finance) and
    - ethicsARCchairman@advanced-medtech.com (ARC Chairman only)
- the relevant procurement or quality contact, for concerns about a supplier

Generally, raising concerns links to our policy: AMTH-GOPP-HR-001 Whistle Blowing Policy V02.

Reports may be made confidentially and, where the channel allows it, anonymously. Information is shared only with those who need it in order to respond. Retaliation against anyone who raises a concern in good faith, or who assists an investigation, is prohibited and will be treated as a disciplinary matter.

In the United Kingdom a concern may also be raised independently with the Modern Slavery and Exploitation Helpline on 08000 121 700, with the Gangmasters and Labour Abuse Authority where labour supply is involved, or in an emergency with the police on 999.

Our Supplier Code of Conduct requires our suppliers to uphold these rights and extends that expectation to entities that supply us indirectly, so that workers in the first and second tier of our supply chain are entitled to the same protections and reporting routes.

8 · How we respond to a report

We operate a documented response standard with defined time limits, so that a report is acted on rather than considered.

Stage	Commitment
Immediately	If any person may be at immediate risk of harm, their safety takes priority over investigation. We contact emergency services first.

Stage	Commitment
Within 2 working days	Written acknowledgement to the reporter, with a reference and a named contact, unless the report was made anonymously through a channel that does not permit reply.
Within 5 working days	Documented triage: credibility, severity, safeguarding need, whether to notify the authorities, and assignment of an owner.
Within 10 working days of triage	Investigation assigned to a person independent of the commercial relationship or function concerned. Where internal independence is not available, we instruct external support.

Where a supplier discloses a problem, cooperates with the authorities and is not itself complicit, we do not de-list or suspend it automatically. Termination is considered only where remediation is refused, impossible or unsafe, and the decision takes account of the effect on the workers concerned. Abrupt disengagement can cause more harm than it prevents.

Where harm has occurred, our response prioritises the affected people: safeguarding, preservation of wages and employment, repayment of any recruitment fees, return of identity documents, access to independent advice, and engagement with the relevant authorities or specialist organisations.

9 · Training

Modern slavery training is mandatory for our employees. It is developed by a specialist third party and delivered through our own staff and that provider, is assigned at induction, refreshed every twelve months and re-issued when a relevant policy is updated, and completion is recorded.

The training covers the eleven International Labour Organization indicators of forced labour — abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime. It is designed so that those who complete it understand the indicators of modern slavery, how to report a suspicion, what our statement obligations are, how to weigh modern slavery risk when buying goods and services, and how to carry out due diligence on our behalf.

We do not currently provide modern slavery training to our suppliers. Making our awareness module available to our operational suppliers is an objective for the coming period.

10 · Measuring effectiveness

This is our first reporting period. The measures below are in place and results will be reported for the first time in our statement for the year ending 31 March 2027, where we will report actual performance and explain any material shortfall.

Area	Measure	Target
Policies	The Supplier Code of Conduct must be signed by all suppliers	100 per cent of in-scope suppliers
Risk assessment	Supplier evaluation recording the number of suppliers aligned with the Supplier Code of Conduct	All in-scope suppliers evaluated annually
Training	Volume of modern slavery training assigned to and completed by employees	100 per cent completion

These measures are reviewed by senior management at least annually.

11 · Priorities for the next twelve months

Over the next twelve months Dornier MedTech UK Ltd will:

- publish this statement and link it prominently from its website
- add an access to remedy provision to the Supplier Code of Conduct
- document a first-tier supply base map with a category and country risk rating and extend it to the second tier for product
- approve and operate a time-bound response standard for reports of suspected modern slavery
- confirm and publish a confidential reporting channel accessible to employees and third parties
- make modern slavery training available to operational suppliers and record completion
- establish ongoing monitoring of recruitment agencies and labour providers, and extend supplier audit scope to labour conditions
- complete the assessment of our purchasing practices across all eight recognised pressure points
- assess the effectiveness of our reporting arrangements with senior leadership involvement
- establish baseline results for each measure above so that year-on-year improvement can be shown

12 · Approval and publication

This statement was approved by the Board of Directors of Dornier MedTech UK Ltd and is signed by a director.

Board approval date: 25 August 2026

Signed: Henrik Welbers

Name: Henrik Welbers

Title: Managing Director, Dornier MedTech UK Ltd

Date: 30 August 2026

Signed:

Name: Yau Chung Wong

Title: Chairman of the Board, Dornier MedTech UK Ltd & Group President & CEO

Date: 31 August 2026

Published at https://www.dornier.com/supplier-information/ with a link in a prominent place on the homepage.

Direct download via: https://www.dornier.com/wp-content/uploads/2026/08/Dornier_MedTech_UK_Modern_Slavery_Statement.pdf

This statement will be reviewed and updated annually.