

# Modern Slavery Improvement Overview

## Policy & MSAT constant Improvement plan 2025–26

### COMMITMENT TO Eliminating Modern Slavery

Chromis UK Ltd UK Limited (trading as Freeway Medical & Freeway Med-Tech) is committed to continuous improvement in our supply chain assessment and fulfilling the recommendations of the UK's Modern Slavery assessment targets and working with the entire supply chain in partnership to ensure our entire organisation will be in a stronger position to mitigate any identified risks.



## Providing Transparency in Supply Chains Anti-Slavery Policy and Human Trafficking Statement

### Modern Slavery Policy & Human Trafficking Statement 2025-26

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Freeway Medical - trading name of Chromis UK limited (referred to for the purposes of this document as Freeway Medical) has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We expect the same high standards from all of our suppliers. We expect them to adopt the same zero tolerance approach to the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

To that end, we have developed an Anti-Slavery Policy which sets out our approach to modern slavery and which applies to everyone working directly or indirectly for or with us. Modern slavery legislation will form part of our supplier screening process. The business' approach to the prevention of modern slavery has buy in from the highest levels of management within our organization.

As part of our supply chain process, we shall be assessing our supply chain against the Modern Slavery Act 2015 and we are amending our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude.

We have a clear, unambiguous approach to any supplier or business partner who falls foul of this legislation and a contingency plan in place in respect of key suppliers. We protect anyone who brings concerns about modern slavery to our attention.

#### Organisation's structure

We are a national multi-disciplined engineering company based in the UK only. Freeway Medical is the main trading company of the Chromis UK group of companies. The Chromis Group has under 50 employees in the UK and operates in the United Kingdom only.

The Group has a global annual turnover less than £36 million.

#### Our supply chains

Our supply chains include in the region of 102 suppliers, with approximately 11% of these suppliers accounting for 80% of our expenditure on a regular basis. Our direct suppliers are predominantly UK or EU based and support our business in the provision of machinery, materials, equipment and professional services. We have no reason for concern in relation to any current member of the supply chain and their compliance with the Modern Slavery Act.

#### Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We take responsibility for conducting and growing our business in a sustainable and responsible manner. We understand the impact our activities can have on the environment and society and endeavour to ensure we eliminate or mitigate the risk of negative impacts. We have committed to incorporating sustainability into our business strategy and adopting sustainable decision making as an integral part of the way we do business. To that end, we adopted policy statements in relation to group sustainability, Waste Minimization policy (WMM) and contingency planning with specific supply chain redundancy of key provisions, all of which are available internally.

#### Processes for preventing slavery and human trafficking

As part of our initiative to identify and mitigate risk, we are assessing our supply chain to check compliance with modern slavery requirements, as part of which we will set out our expectations in relation to modern slavery and request that they make the same commitment.

Modern slavery compliance will be an integral part of our supplier approval and re-qualification processes and we will train our staff in the relevant legislation. We have an accepted approach for suppliers who breach the Modern Slavery Act and this is to be communicated to our supply chain and business partners.

We have a dedicated person for dealing with concerns about compliance with the Act and protections in place for anyone who brings matters of concern to our attention.

We are satisfied that we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

#### Our effectiveness in combating slavery and human trafficking

We employ regular reviews on our schemes to certify our supply chains' compliance with modern slavery requirements. This is carried out on an annual basis. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending Fy2025.

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## OVERVIEW ASSESSMENT FROM UK GOV. FEED BACK

Baseline emissions are a record of the greenhouse gases (GHG) that have been produced in the past and were created prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

## OVERVIEW OF PROGRESS

This overview document presents the progress made by Freeway Medical, trading as Chromis UK Limited, against the Modern Slavery Assessment Tool (MSAT) improvement plan. The MSAT improvement plan was implemented to address and mitigate the risks of modern slavery within our operations and supply chain.

### Background

Following the Introduction to MSAT The MSAT is a comprehensive tool designed to assess and enhance our practices related to preventing and addressing modern slavery. It encompasses areas such as supply chain transparency, risk identification, due diligence, and employee training.

### Progress Highlights

progress has been made in two key areas this year and following feed back from MSAT review we are focusing on Supply Chain Transparency and implementation of Traceability Measures. Significant strides have been made in enhancing transparency across our supply chain. We have implemented traceability measures, mapping the entire supply chain to identify high-risk areas and ensure compliance with ethical sourcing standards.

### Supplier Engagement

Engagement with suppliers has been a focal point. We have conducted workshops and training sessions to raise awareness about modern slavery risks and expectations. Our suppliers are actively involved in our commitment to eradicating modern slavery.

### Robust Risk Assessment Framework

The MSAT improvement plan included the development of a robust risk assessment framework. This framework has been integrated into our procurement processes, enabling us to identify and evaluate potential risks associated with modern slavery

### Continuous Monitoring

Continuous monitoring of high-risk areas and suppliers is underway. Regular risk assessments are conducted, and a proactive approach is taken to address emerging issues promptly.

## Risk Identification and Assessment

### Employee Training and Awareness

#### Training Programs

A comprehensive training program on modern slavery awareness and prevention is to be rolled out for 2024/25 across the organization. This program ensures that by 2026 that all employees understand the signs of modern slavery, their role in prevention, and the reporting mechanisms in place.

### Challenges and Remedial Actions

#### Unforeseen Challenges

While progress has been significant, there have been challenges, such as limited visibility in certain tiers of the supply chain. Efforts are underway to collaborate with suppliers and address these challenges collectively.

#### Remedial Actions

Remedial actions include increased collaboration with industry peers, engaging with external experts, and investing in technology solutions to enhance supply chain visibility.

#### Future Roadmap

Continuous Improvement Freeway Medical remains committed to continuous improvement. Our future roadmap includes ongoing refinement of the MSAT improvement plan, integration of emerging best practices, and staying informed about legislative changes related to modern slavery.

#### Collaborative Initiatives

We will actively engage in collaborative initiatives within our industry to collectively combat modern slavery. This includes participating in industry forums, sharing best practices, and contributing to the development of ethical sourcing standards.

#### Conclusion

The progress against the MSAT improvement plan underscores Freeway Medical's commitment to eradicating modern slavery from its operations and supply chain. While challenges persist, the proactive measures taken and ongoing commitment to improvement position us well to achieve our goal of a slavery-free business environment.

This Modern Slavery Improvement Overview document has been reviewed and signed off by the Board of Directors (or equivalent Management Body).

Signed on behalf of Chromis UK Ltd.

Date: 9<sup>th</sup> September 2025