

Modern Slavery & Suppliers Overview

Policy Supplier and Sub- Contractor Management 2025–26

Introduction

Freeway Medical - Chromis UK is dedicated to ensuring ethical practices throughout its supply chain, including a firm stance against modern slavery. This policy outlines our commitment to managing suppliers and sub-contractors to ensure compliance with ethical standards and legal requirements, including those related to modern slavery.



Providing Transparency in Supply Chains

Policy Scope

This policy applies to all suppliers, sub-contractors, and business partners of Freeway Medical - Chromis UK. It covers the selection, assessment, and ongoing management of these entities to ensure compliance with our ethical standards and legal obligations.

3. Policy Statement

Freeway Medical - Chromis UK is committed to:

- Conducting business ethically and with integrity.
- Ensuring that suppliers and sub-contractors comply with relevant laws and regulations, including those related to modern slavery.
- Implementing rigorous due diligence and monitoring processes to prevent and address any forms of modern slavery within our supply chain.

4. Supplier and Sub-Contractor Selection

- **Criteria for Selection:** Suppliers and sub-contractors are selected based on their ability to meet our quality, service, cost, and ethical standards.
- **Ethical Compliance:** Potential suppliers and sub-contractors must demonstrate compliance with anti-modern slavery laws and ethical practices.

5. Modern Slavery Compliance

- **Modern Slavery Policy:** Suppliers and sub-contractors must have a modern slavery policy in place that meets legal requirements and reflects a commitment to preventing modern slavery.
- **Due Diligence:** Due diligence must be conducted on all suppliers and sub-contractors to ensure they adhere to modern slavery laws and ethical standards.

6. Due Diligence Process

1. Initial Assessment:

- **Documentation Review:** Evaluate the supplier's modern slavery policy and related documents.
- **Risk Assessment:** Conduct a risk assessment to identify potential modern slavery risks associated with the supplier.
- **Questionnaire:** Suppliers must complete a modern slavery compliance questionnaire detailing their policies, practices, and training programs.

On-Site Audits:

- **Audit Schedule:** Schedule regular audits for high-risk suppliers to verify compliance with modern slavery laws.
- **Audit Checklist:** Use a standardized checklist to assess compliance, focusing on working conditions, recruitment practices, and employee rights.

Third-Party Verification:

- **External Auditors:** Engage third-party auditors to conduct independent assessments of suppliers' practices where necessary.
- **Certification:** Preference for suppliers with recognized certifications (e.g., SEDEX, SA8000)

Ongoing Monitoring and Management

- **Regular Reviews:** Conduct regular reviews of suppliers and sub-contractors to ensure ongoing compliance with modern slavery laws and ethical standards.
- **Training and Awareness:** Provide training and resources to suppliers on modern slavery and ethical practices.
- **Contractual Obligations:** Include modern slavery compliance clauses in all contracts with suppliers and sub-contractors.

8. Reporting and Remediation

- **Reporting Mechanism:** Establish a confidential reporting mechanism for employees, suppliers, and other stakeholders to report any suspected incidents of modern slavery.
- **Remediation Plan:** Develop and implement a remediation plan for addressing any identified instances of modern slavery, including steps to support affected individuals and prevent recurrence.

9. Consequences of Non-Compliance

- **Termination of Relationship:** Freeway Medical - Chromis UK reserves the right to terminate relationships with suppliers or sub-contractors that fail to comply with modern slavery laws and this policy.
- **Corrective Actions:** Suppliers may be required to implement corrective actions within a specified timeframe to address non-compliance issues.

10. Policy Review

This policy will be reviewed annually and updated as necessary to ensure its effectiveness and alignment with legal requirements and best practices.

11. Contact Information

For any questions or concerns regarding this policy, or to report an incident, please contact the Compliance Officer at compliance@freewaymedical.co.uk

Approval and Acknowledgment

This Supplier and Sub-Contractor Management Policy has been approved by the management of Freeway Medical - Chromis UK. All employees, suppliers, and sub-contractors are required to acknowledge their understanding and compliance with this policy.

Signed on behalf of Chromis UK Ltd.

Date: 2nd September 2025

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