

## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT FOR FY25

### INTRODUCTION

This statement is published on behalf of Tristel Plc and its Group companies ("the Group"). Tristel is a global manufacturer and distributor of infection prevention and contamination control products. Our business operates under two principal brands: Tristel for medical instrument disinfection and Cache for hospital surface disinfection.

We are committed to conducting our business ethically and responsibly, ensuring that modern slavery and human trafficking have no place in our operations or supply chains. We recognise our corporate responsibility to uphold human rights and embed this commitment in our culture, which is defined by three core values: *No-nonsense*, *Considerate*, and *Energetic*. Staff are expected to act with honesty and integrity and are encouraged to report any wrongdoing.

### ORGANISATION'S STRUCTURE

Tristel Plc is governed by a Board of Directors comprising two Executive Directors (including the Chief Executive Officer) and four Non-Executive Directors. The Group employs over 265 people globally, operates 19 subsidiaries, and distributes products to over 65 countries.

### OUR BUSINESS AND SUPPLY CHAINS

Our mission is to prevent the transmission of microbes, particularly in healthcare settings where infection risks are highest. We work with over 1,200 suppliers worldwide to source components and services for manufacturing, distribution, and marketing. This includes raw materials, equipment, packaging, transportation, storage, research and development services, and outsourced packing operations.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

As a relevant commercial organisation under Section 54 of the *Modern Slavery Act 2015*, we comply with its annual reporting requirements. Our *Anti-Slavery and Human Trafficking Policy* outline our commitment to ethical business practices, supported by a robust due diligence process and effective systems to prevent slavery. We also maintain a *Whistleblowing Policy*, *Equal Opportunities Policy*, and *Anti-Bribery and Corruption Policy* to reinforce our ethical standards.

### INTERNATIONAL CONSIDERATIONS

We recognise modern slavery as a global issue and align our practices with international standards such as the ILO Conventions. We also consider relevant legislation in jurisdictions where we operate, including the *EU Corporate Sustainability Due Diligence Directive (CSDDD)* and the *Commonwealth Modern Slavery Act 2018 (Australia)*.



## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

We actively identify and mitigate risks in our supply chain. Suppliers are required to confirm compliance with modern slavery legislation and provide relevant policies. Our current systems allow us to assess risk areas informally, monitor supplier activities, and protect whistleblowers. We are enhancing these systems to include formal risk assessments and more structured monitoring processes.

## **OUR WORKFORCE**

We consider the risk of modern slavery within our directly employed workforce to be low, given its professional and skilled nature. However, we take proactive steps to manage potential risks and uphold ethical employment standards. These include:

- Accreditation as a UK Living Wage Employer
- Regular review of recruitment processes and employment practices to ensure compliance with legislation and best practice
- Use of reputable employment agencies for temporary staffing
- Provision of employment contracts and access to key policies from the outset, including Equal Opportunities, Harassment, Grievances, and Whistleblowing
- Payment of wages above the statutory minimum, directly into employees' bank accounts
- A maximum 40-hour working week, with all overtime being voluntary
- Holiday entitlements that meet or exceed statutory requirements
- A strict policy against child labour
- Routine health and safety risk assessments
- Provision of appropriate personal protective equipment (PPE)
- Promotion of open and effective communication with staff
- Encouragement for employees to raise concerns with senior managers without delay
- Implementation of clear workplace policies and procedures to support a safe and fair working environment

## **SUPPLIER ADHERENCE TO OUR ETHICS**

We aim to source responsibly and work with suppliers who share our ethical standards. Our evolving systems will allow us to periodically assess supplier risk based on country of origin, nature of goods or services, and transparency. This helps us ensure that our supply chain remains free from slavery and human trafficking.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business:

- The senior members of our procurement team have undergone targeted risk awareness training.
- All UK-based employees complete Modern Slavery UK Training via our Learning Management System (LMS), which is also included in our employee induction programme.

## **KEY PERFORMANCE INDICATORS**



To measure the effectiveness of our anti-slavery actions, we have established internal KPIs focused on increasing awareness of modern slavery risks and tracking progress against our objectives. These indicators help us ensure that our organisation and supply chain remain vigilant and responsive to potential risks.

#### **ANTI-SLAVERY OBJECTIVES FOR THE FORTHCOMING YEAR**

We are committed to continuous improvement in our anti-slavery efforts. Our objectives for the coming year include:

- Reviewing and updating supplier documentation to include anti-slavery clauses
- Further tracking and refining our Key Performance Indicators (KPIs)
- Expanding supply chain mapping to engage 2nd Tier suppliers
- Launching a Modern Slavery Risk Assessment Project, with Phase 1 focusing on suppliers of materials used in products we place into the marketplace

*This statement is an update to our slavery and human trafficking statement for the financial year ending 30.6.2025*

Approved by the Board,

Anna Wasył, CFO  
Tristel Plc

17 November 2025

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