

Modern Slavery Statement and policy

1. Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which involve the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We recognize the complexity and seriousness of these issues and are committed to identifying, preventing, and addressing any risks of modern slavery within our operations and supply chains. Our approach is underpinned by the principles of ethical conduct and integrity in all business dealings.

We have a zero-tolerance stance on modern slavery and aim to implement and enforce effective systems and controls to ensure modern slavery is not taking place within our business or supply chain.

Our commitment extends to collaborating with external stakeholders to promote broader awareness and systemic solutions to combat modern slavery. We strive to create a culture where the highest standards of ethical behavior are expected and upheld across all tiers of our operations and supply chain.

2. Organizational Overview

Cercare Medical is a health tech company based in Denmark, with offices in Denmark, US and UK. We develop medical imaging software and support ethical labor conditions. Supply chain duty is the responsibility of all employees purchasing. Overall, supplier management is facilitated by the Quality Assurance and Regulatory Affairs Team.

3. Responsibility for this Policy

This policy applies to all employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

The Board of Directors is responsible for providing oversight and ensuring that modern slavery risks are integrated into the broader governance and risk management processes.

The CEO holds primary accountability for implementing this policy and ensuring its alignment with organizational objectives. This includes ensuring the necessary resources and focus are dedicated to this issue.

4. Raising Concerns and Reporting Violations

It is your responsibility to read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is a shared obligation for everyone working for us or under our control. You must avoid any activity that might lead to or suggest a breach of this policy.

You should notify your manager or write to the whistle blower channel as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Any genuine concerns raised in good faith will be thoroughly investigated and addressed, even if found to be unsubstantiated.

5. Breach Consequences

Any employee found to be in breach of this policy will face disciplinary action, which could result in dismissal of misconduct or gross misconduct.

We reserve the right to terminate our relationship with individuals or organizations working on our behalf if they are found to be in breach of this policy.

Suppliers or contractors found to be non-compliant will be given the opportunity to rectify the issue within a specified timeline. Persistent breaches will result in the termination of contracts and partnerships.

6. Modern Slavery Risk

Given our primary operations are software-based and located in countries with strong legal frameworks, the risk of modern slavery is **low**. However, we recognize risks may exist in:

- Internal workforce
- Hardware supply chains (e.g., servers, devices)
- Distribution/logistics via partners
- Outsourced professional services

7. Preventative Measures

- Supplier due diligence during onboarding and annually.
- Supplier code of conduct.
- Employee whistle blower channel.
- Participation in the **UK MSAT** process initiated Q3 2025.

8. Commitments

- We have completed the **Modern Slavery Assessment Tool**.
- Risk evaluation of all suppliers.
- Annual reviews of supplier compliance.
- Conduct internal anonymous workplace assessments for internal employees.
- Annual internal training for all staff.
- Safeguarding commitment by tracking attendance records for training (KPI).

Declaration and Approval: This document is reviewed and approved by the Cercare Medical CEO and Board of Directors.

Annual review: Evaluation of supplier compliance is performed on an annual basis. This statement document is reviewed when evaluated as necessary.

Applicable: document was updated Q3 2025