



Modern Slavery and Ethical Sourcing Policy

Version 2.1 | Previous Version 2: 15 September 2026

Approved and effective: 2 October 2026

Next review: 2 October 2027, or earlier upon material change

1. Purpose

This policy sets out Falcon Stars Group Ltd's approach to preventing modern slavery and promoting ethical sourcing in its operations and supply chains. It is designed to be proportionate to the company's current size and healthcare instrument sourcing, importation and distribution model.

2. Scope

This policy applies to Falcon Stars Group Ltd, its personnel, and the selection and management of suppliers, manufacturers, freight providers, logistics partners and other relevant business partners.

3. Policy Principles

- No tolerance for slavery, servitude, forced or compulsory labour, human trafficking, child labour or coercive recruitment.
- Compliance with applicable local and national employment, labour and human-rights laws.
- Workers must be free to leave employment in accordance with applicable law and contractual notice requirements.
- Respect for workers' freedom of movement and prohibition of confiscation or retention of passports or other original identity documents as a means of coercion.
- Respect for lawful freedom of association and worker representation.
- No recruitment fees charged to workers and no recruitment practices that create debt bondage or other forms of worker exploitation.
- No compulsory overtime; working hours and overtime must comply with applicable law and must not be imposed through coercion.
- No child labour and appropriate age-verification controls should be maintained where relevant.
- No violence, threats of violence, harassment, intimidation, discrimination or other degrading treatment.
- Fair treatment and non-retaliation where concerns are raised in good faith.
- Where credible harm is identified, proportionate steps should be taken to support access to remedy, corrective action and appropriate escalation.

4. Supplier Due Diligence

Falcon Stars Group Ltd will apply proportionate, risk-based due diligence to direct suppliers and other relevant partners.

- Record direct supplier identity, location and nature of goods or services.
- Consider geographic, sector, product, workforce and labour-model risk indicators.



- Consider recruitment practices, use of labour providers, worker-paid recruitment fees and indicators of debt bondage where relevant.
- Request additional information, declarations or assurance where risk warrants it.
- Maintain relevant supplier and due-diligence records.
- Review material concerns before onboarding or continuing a relationship.

5. Higher-Risk Supply Chains

Where a country, sector, product or labour model presents elevated modern slavery risk, the company will apply enhanced scrutiny proportionate to the circumstances. Identification of a higher-risk geography, sector or category does not imply wrongdoing by an individual supplier; it indicates a need for appropriate due diligence.

6. Supplier Expectations

- Comply with applicable laws relating to forced labour, trafficking, child labour, working conditions, employment and worker rights.
- Apply the principles in this policy to relevant workers and operations supporting goods or services supplied to Falcon Stars Group Ltd.
- Provide accurate information reasonably requested for due-diligence purposes.
- Communicate relevant ethical sourcing requirements to appropriate personnel and, where proportionate, relevant subcontractors or labour providers.
- Cooperate with proportionate corrective actions where a concern or gap is identified.
- Notify Falcon Stars Group Ltd of material modern-slavery concerns relevant to goods or services supplied to the company.
- Where a supplier is assessed as higher risk, Falcon Stars Group Ltd may require compliance with relevant modern-slavery requirements as a contractual condition.

7. Raising, Reporting and Managing Concerns

Personnel and relevant business partners are encouraged to report suspected modern slavery, exploitation or breaches of this policy to the Director. Concerns raised in good faith will be treated seriously and without retaliation. Falcon Stars Group Ltd will assess credible concerns, seek further information where appropriate, document actions taken, and consider corrective action, escalation, suspension or termination of a relationship where serious concerns are substantiated and not remedied. Where appropriate, the company will consider referral to relevant authorities or specialist organisations and proportionate measures to support affected workers.

8. Training and Communication

Relevant personnel will receive proportionate awareness and guidance on modern slavery risks and this policy as the business grows. The policy will be made available internally and publicly and communicated to relevant suppliers and other stakeholders where appropriate. Higher-risk suppliers may be required to confirm awareness of, and compliance with, relevant policy requirements.



9. Purchasing Practices

Falcon Stars Group Ltd will consider whether its purchasing practices, including pricing, lead times, order changes and other commercial pressures, could contribute to labour exploitation or modern slavery risk within the supply chain. Where a material risk is identified, proportionate mitigating action will be considered.

10. Monitoring, KPIs and Review

The Director is responsible for oversight. The policy will be reviewed at least annually and following material changes in the company's operations, supply chains, applicable requirements or identified risks. The company will progressively develop proportionate indicators to monitor implementation, which may include supplier risk assessments completed, due-diligence responses received, policy communications, training completion, concerns raised and corrective actions.

11. Records

Falcon Stars Group Ltd will retain proportionate records of supplier mapping, due-diligence information, policy communications, training, identified concerns, actions, corrective measures and policy reviews.

12. Continuous Improvement

Falcon Stars Group Ltd will use relevant assessment findings, including Modern Slavery Assessment Tool recommendations, supplier due-diligence information and operational experience to strengthen its controls over time in proportion to the size, nature and risk profile of the business.

Approval

Approved by Adnan Aslam, Managing Director
2 October 2026