

1. Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, often in horrendous conditions from which the victim cannot escape. 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.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation.

Gynesonics, Inc. has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

2. Statement

As a Small-Medium Enterprise, Gynesonics, Inc. is not required under this legislation to produce a yearly statement at this time. However, we choose to voluntarily produce a statement.

The UK Modern Slavery Act (2015) specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business. Gynesonics, Inc. cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

3. Organisational Information

Gynesonics, Inc. is a United States company with international operations, including the United Kingdom. The company develops and manufactures minimally invasive therapeutic devices for the medical device industry for the treatment of women's health, which are sold within in markets such as the US, UK, and Europe.

This statement is written in respect of the activities and employees within the UK, while also reflecting on the global activities and processes of the organisation.

4. Our Supply Chain and Procurement

Our products are manufactured in the United States and in Mexico, and we purchase the materials required from around the World. We maintain an approved supplier list of over 200 companies.

Gynesonics, Inc. are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners. When procuring goods or services we have processes in place to consider Modern Slavery risks. We ensure we carry out supplier due diligence.

This includes:

- Robust supplier selection and policies;
- Supplier questionnaire and audit;
- Mapping of the supply chain to identify geographical areas of higher risk;
- Requiring high-risk suppliers associated with a Global Slavery Risk Index of ≥ 6 , as part of the contract, to adhere to modern slavery policies and principles.

We require our suppliers, as part of the selection process and yearly auditing, to confirm adherence to our Ethical Trading, Human Rights and Labour Standards Policy and we have a Supplier Code of Conduct in place. We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices.

Such as:

- Aggressive pricing that doesn't consider sustainable production costs;
- Short lead times and late high-volume orders;
- Inaccurate forecasting;
- Late or extended payments;
- Withdrawing from contract at the last minute;
- Enforcing unfair penalties for not meeting orders;
- Making last minute changes to order specifications or volumes;
- Providing inaccurate specifications.

5. Areas of risk identified within the business and supply chain

The risk level is determined using the scale according to the global slavery index.
<https://www.globallslaveryindex.org>

Supplier Mapping

The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as overall low.

Of the companies listed on our approved vendor list, over 85% are based in the United States and over 98% have a risk rating of 3 or less.

There are 3 companies on our approved supplier list that have a risk rating of 4 or 5 putting them in the medium risk category.

As part of our supplier due diligence in support of Gynesonics certification to ISO standard 13485, we routinely conduct supplier audit and/or assessment for our Tier 1 suppliers.

We have not mapped our supply chain beyond Tier 1 and plan to take this forward into our management review for high-risk suppliers as an opportunity for improvement.

The risk level will be reviewed yearly and reported on.

6. Policies and Processes relating to Modern Slavery

- Ethical Trading, Human Rights and Labour Standards Policy (POL 10002);
- Supplier Audit Procedure (SOP 00030);
- Supplier Review and Approval Form (FRM 00024-001);
- Supplier Sustainability Review Form (FRM 10026);
- Supplier Code of Conduct (POL 10001);
- Business Conduct Policy (SOP 04858-003).

7. Key Performance Indicators

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been. Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

- Number of suppliers completing our supplier self-assessment audit with the inclusion of modern slavery questions;
- Completion rates for modern slavery awareness training;
- The number of modern slavery cases identified and remediated.

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

8. Training of employees around Modern Slavery

We provide third party independent training on Modern Slavery to all employees in the UK.

The training covers:

- The International Labour Organization (ILO) Forced labour indicators;
- The training ensures that recipients understand;
- Indicators of modern slavery;
- How to report suspicions of modern slavery;
- The modern slavery statement requirements;
- How to consider modern slavery risks in procurement;
- How to be better equipped to undertake modern slavery due diligence for the organisation.

The training is delivered via e-learning and participants are required to pass the course using a competency-based exam. The training is mandatory and is provided on induction and then every 12 months.

9. Reporting

If a case of Modern Slavery is suspected, then the following is advised.

- A suspected victim of modern slavery is not to be approached directly as this may endanger them.
- If an immediate risk to life, then call local emergency (e.g. 911 in the US, 999 in the UK).
- If there is no immediate risk to life, then contact the national helpline or report it online.

Sample Listing, Helpline and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline	See https://www.europeanfreedomnetwork.org/hotline/	
UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager.

If modern slavery is identified or suspected abroad, then will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

If the response from any of our suppliers, regardless of location, seems inadequate and adequate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance, and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions could then be included in the next statement produced.

10. Whistleblowing

We have a Whistleblowing process in place that all employees are aware of through the Business Conduct Policy.

11. Breaches

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Any suppliers, individuals or organisations working with us, or on our behalf who breach this policy may have their relationship or contract with us terminated.

12. Responsibility

Senior VP Global Operations
Chief Human Resources Officer
Healthcare Compliance Officer

13. Review and Communication

This statement is reviewed and approved by executive management, and published:

- On our website at <https://gynesonics.com/us/compliance/>
- Uploaded to the UK Modern Slavery Statement registry:
<https://modern-slavery-statement-registry.service.gov.uk>

Internally it will be sent to all employees and sent to our supply chain and other interested stakeholders.

14. Senior Management Approval

SIGNED:

DocuSigned by:
Skip Baldino
Signer Name: Skip Baldino
Signing Reason: I approve this document
Signing Time: 3/27/2024 | 9:01 AM PDT
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NAME:

Skip Baldino

JOB TITLE:

President / CEO

DATE:

3/27/2024 | 9:01 AM PDT