

# **Modern Slavery Statement**

### Financial year 2024

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes Etac Ltd's commitment and actions to prevent the risk of modern slavery and human trafficking in our operations and supply chain.

#### Description of our company and supply chain

Etac Ltd is a supplier of assistive devices and patient handling equipment in the UK. Founded in 2003 and headquartered in Hartlebury, Worcestershire, the company employs approximately 84 people. Etac Ltd is part of the Etac Group ("Etac"), established in 1973 and headquartered in Sweden.

Etac's ambition is to provide solutions that improve quality of life for the individual, family members and caregivers. Through our specialised product brands, we offer state-of-the-art solutions for a wide range of daily needs and care settings, for people at all stages of life. Our products are designed to promote the individual's abilities and support caregivers in their daily work – through high quality, user-friendly functionality, and by delivering great value over time.

Etac encompasses ten product brands: R82, Convaid, Ki, Klaxon, Axiom, Star, Molift, Immedia, HoverTech and Etac. Our research and development centres are located in Scandinavia, Austria and the United States, while our own manufacturing facilities are located in Sweden, Denmark, Austria, the United States and Poland.

Like most other manufacturing companies, Etac has a global supply chain. Some suppliers are in proximity to our manufacturing sites in Europe and the United States, but Etac also has suppliers in other regions of the world such as Asia.

# Policies related to modern slavery

Modern slavery can take many forms, such as trafficking of people, forced labour, servitude, and slavery. Etac has zero tolerance for any form of modern slavery and does not accept any violations in any part of our operations and supply chain.

Our commitment to prevent the risk of modern slavery and human trafficking is supported by our internal Code of Conduct and our Supplier Code of Conduct.

- Code of Conduct: Applicable to everyone within Etac, from the Board of Directors to all employees worldwide, including part-time-, contract- and temporary employees.
- Supplier Code of Conduct: Applicable to all suppliers, their subcontractors and other business partners that provide products or services to (do business with) Etac.

Link to our policies: https://www.etac.com/en-gb/uk/about-us/sustainability/codes-of-conduct/

#### Risk assessment

Etac has worked with different types of risk assessments and in 2024, Etac conducted a double materiality assessment in line with EU's Corporate Sustainability Reporting Directive (CSRD). The assessment involves multiple steps including a value chain analysis and stakeholder engagement. With regards to human rights issues (e.g., modern slavery), Etac does not see any material risk of it in its own, internal operations but recognises a material risk in its outsourced supply chain. Highest risk is deemed to be in countries where there is well-documented risk of human rights abuses, and potentially modern slavery. Apart from visiting supply chain partners, Etac is currently working on implementing a Supplier Relationship Management (SRM) system that will ease and strengthen risk assessment, thus enabling a more precise supply chain follow-up and action where required.

## Due diligence processes

As described above, Etac has embedded responsible business conduct in our core policies and is working with identification and assessment of potential adverse impacts. Regarding the latter, Etac's Supplier Code of Conduct also reserves the right for Etac to monitor our suppliers' compliance with our Supplier Code of Conduct. Our programme may consist of on-site audits



and/or periodic self-assessments by suppliers of their premises and those of their subcontractors. The supplier shall submit at any time to announced as well as unannounced audits. The supplier is required to provide physical access to any auditor from Etac or other auditor assigned by Etac. This obligation entails unhindered access to all facilities, records, and where provided by suppliers, housing, as well as access to employees for confidential interviews. The frequency and intensity of supplier audits and assessments is currently being reviewed and strengthened.

Where instances of non-compliance are identified, Etac's Supplier Code of Conduct sets out clear expectations with regards to corrective action and remediation. The Supplier Code of Conduct also include zero-tolerance standards, which means that Etac will not conduct business with a supplier engaged in violations of fundamental human rights.

Etac did not record- or uncover any incidences of modern slavery within internal or external supply chains during 2024.

#### Training and capacity building

Our employees are made aware of our commitment to prevent the risk of modern slavery and human trafficking through our Code of Conduct. We are working on strengthening our employee awareness and training (see Future plans and commitments).

Our suppliers are made aware of our commitment to prevent the risk of modern slavery and human trafficking through our Supplier Code of Conduct. Our Supplier Code of Conduct includes an expectation that the standards included in the Code shall be communicated by the Supplier to all new employees, including managers and supervisors, immediately upon hiring.

# Key performance indicators

Etac is using key performance indicators, such as share of direct material suppliers that have signed our Supplier Code of Conduct or provided an equivalent version. We are currently in the process of reviewing and strengthening our set of key performance indicators (see Future plans and commitments).

# Grievance mechanisms

All stakeholders, including supply chain employees, are encouraged to report on conduct that might not be in line with the law or our Codes of Conduct. Potential violations and/or suspected misconduct may be reported directly to a manager in our organisation or reported anonymously through our whistleblowing channel, WhistleB.

We do not tolerate any form of retaliation or adverse consequences against anyone for engaging in the reporting of suspected misconduct. The whistleblowing channel is provided by an external partner to ensure anonymity. The communication channel is encrypted and password protected. All messages are processed confidentially and the person sending the message also remains anonymous in the subsequent dialogue with the whistleblowing team that consists of the Group Chief Executive Officer (CEO), Group Chief Financial Officer (CFO) and Group Human Resources (HR). To safeguard the system, all reported messages are also reviewed by our audit committee, which among others include the Chairman of the Board and our external auditor.

Link to Etac's whistleblowing channel: https://report.whistleb.com/en/etac

## Actions during 2024

- Strengthened our corporate sustainability team.
- Conducted a double materiality assessment in line with EU's Corporate Sustainability Reporting Directive (CSRD).
- Updated and rolled out a new version of our Code of Conduct, available in ten languages.
- Initiated an update to our Supplier Code of Conduct. It will be rolled out in 2025.
- Invested in a Supplier Relationship Management system (SRM) that will ease and strengthen risk assessment and follow-up of the supply chain.



# Future plans and commitments

We are continuously striving to improve and strengthen our practices. In 2025, we plan to:

- Follow-up on the Code of Conduct signing requirement for employees.
- Roll out a training programme to ensure employees understand and adhere to our new Code of Conduct.
- Roll out a training programme on forced labour to ensure that employees in risk functions strengthen their understanding of how to identify potential forced labour (based on ILO's 11 indications).
- Finalise and release a new version of our Supplier Code of Conduct.
- Further strengthen our Group purchasing practices and key performance indicators.

# Responsibility

Etac's Group CEO is ultimately responsible for the implementation of and compliance with our policies regarding responsible business conduct. In the UK, our Company Directors have responsibility for the policies and ensuring that we comply with all legal and ethical obligations.

# **Board approval**

This statement has been approved by Etac Ltd's Board of Directors (12 June 2025).

Hartlebury, 12 June 2025

Andrew King Sales Director Andrew Goode
Operations Director