

# Feedback Medical's Modern Slavery and Human Trafficking Statement

## Introduction

Feedback Medical Limited ("Company" or "Feedback Medical") produces innovative technology to enhance clinical communication.

Modern slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking ([Transparency in supply chains: a practical guide, 2021](#)).

The Company is committed to operating with integrity in all of its business conduct. We strongly condemn any acts of modern slavery and human trafficking and are therefore, implementing procedures to ensure that modern slavery does not and cannot occur within our business and that of our suppliers.

This statement is based on our financial year ending 31 May 2024.

Feedback Medical is not legally required to produce a modern slavery statement. However, we voluntarily publish our modern slavery statement as a reflection of our commitment to combating modern slavery and human trafficking, promoting ethical practices, and ensuring transparency within our operations and supply chains.

## Company registration details

- Feedback Medical Limited is a company registered in England and Wales.
- Registered Number: 04025026.
- Registered Office address: 201 Temple Chambers, 3-7 Temple Avenue, London EC4Y 0DT.

## Our company structure and supply chain

Feedback Medical is a small organisation of less than 30 employees, based in the UK in the health technology industry. Everyone is employed on contracts that are fully compliant with UK law and regulations. Our employees are highly skilled, and salaries reflect those skillsets and align with industry standards.

We also have a small number of UK-based contractors working for us on fixed term contracts which are also compliant with UK law.

Our primary client base is UK-based healthcare service providers.

Our main critical suppliers are based in the UK, US and Poland. We have long established relationships with most of our critical suppliers, therefore we are familiar with their operations and policies.

We expect our suppliers to operate with the same integrity and standards as we do. We conduct an assessment process for all critical suppliers and are selective about who we work with, seeking suppliers who align with our own values.

## Policies

Core policies that reflect our commitment to combatting modern slavery and human trafficking throughout our business operations are as follows:

*Personnel management procedure:* This procedure outlines how we bring employees into our Company with an onboarding process, training and appraisals. All employees are recruited to work for us on an individual basis, going through thorough interview processes to ensure fairness. Employees must provide all the necessary documentation to prove they have the right to work in the UK. We do not recruit employees into the Company in large numbers.

*Employee handbook:* This handbook imparts our expectations for employees and how they conduct themselves. It also includes information for reporting any concerns they identify within our business or that of any supplier.

*Supplier evaluation process:* Our supplier evaluation process details how we assess suppliers that we want to work with. Captured in this process is a specific list of information we collect on them. Corporate social responsibility policies are sought from all critical suppliers, and this explicitly includes their modern slavery policies.

*Purchasing process:* Our purchasing process sits alongside the Supplier evaluation process and provides employees with guidance on what information is required when making any purchases.

Our policies and procedures are reviewed and updated accordingly on a regular basis as part of our ISO certification requirements. Future updates to these procedures will aim to strengthen and improve modern slavery provisions.

## Due diligence

Suppliers working with Feedback Medical are assessed for their own commitments to social responsibility, including modern slavery and human trafficking.

Our procedures, as specified above, are designed to identify, assess and combat potential modern slavery risks. Risks within our industry are considered to be low due to the regions in which we operate and the skillset of employees and suppliers we choose to collaborate with. Suppliers are continually assessed during their contracted term and reassessed at contract renewal.

We expect all suppliers that we work with to embrace the same standards and values, to adopt equivalent policies within their own organisation and we encourage them to have the same expectations of their own suppliers.

Should we identify a situation of suspected modern slavery or human trafficking with a supplier, we would report this to the relevant authorities, assist with any investigations and work with expert industry groups and the supplier to ensure concerns were addressed. We would continue to monitor this closely. We would terminate relationships with any supplier who refused to take responsibility or remedial actions if modern slavery was identified within their organisation, as a last resort.

Feedback Medical is certified to both ISO 13485 – Medical Devices – Quality Management Systems and ISO 27001 – Information Security Management Systems standards. These ISO standards have high expectations for business operations that support our goal to ensure modern slavery does not have a place in our business. We also undergo numerous audits to comply with these standards, which would assist in identifying or exposing a potential modern slavery situation with a supplier.

## Risk assessment

Here at Feedback Medical, we have assessed the areas where we feel the risk is highest within our business operations. We have based this assessment on the industry and regions that we conduct business in.

We have cross-referenced the regions in which we and our main critical suppliers operate against the [Global Slavery Index](#), published by the Walk Free Foundation, and the [2024 Trafficking in Persons Report](#) (TIP Report) released by the U.S. Department of State.

**UK:** GSI Prevalence per 1000 people: 1.8  
GSI vulnerability out of 100: 14  
TIP Report Tier 1 (low risk)

**Poland:** GSI Prevalence per 1000 people: 5.5  
GSI vulnerability out of 100: 19  
TIP Report Tier 1 (low risk)

**USA:** GSI Prevalence per 1000 people: 3.3  
GSI vulnerability out of 100: 25  
TIP Report Tier 1 (low risk)

Ultimately, we consider that the risks associated with our organisation and that of our 3 main suppliers is low. The professional software services industries are widely regarded as lower risk for modern slavery due to the nature of the work, which typically involves skilled workforces and office-based environments. Such industries are also highly regulated and Feedback Medical is certified to two ISO standards with stringent compliance requirements. We undergo many types of audits throughout the year, all of which reduce the likelihood of opportunity and occurrence of exploitation.

We recognise that despite the modern slavery risk being low for our organisation, we must remain vigilant.

## Training

The Company has sought industry expert advice on how we can support the movement to eradicate instances of modern slavery. This has bolstered our knowledge and provided us with information and guidance on signs to look for areas of higher risk and how to report any concerns. Most importantly, this external resourcing has supported us to identify areas where we can make continual improvements.

We are raising awareness with employees about the risks of modern slavery and human trafficking. Employees are trained on our core policies on to ensure continual attention and caution. Information on modern slavery and human trafficking, provided by the UK Government, is also circulated around the business.

All senior managers and employees with key responsibilities in these areas undertake tailored online training to enhance their understanding as well.

## Internal reassessment and future plans

We are committed to reflecting on our progress to ensure that we, and our suppliers, remain compliant with our policies and ensuring that modern slavery and human trafficking do not occur within our organisation.

We are at the beginning of this process but commit to reassessing our actions, updating our policies and training our employees accordingly.

We have an improvement plan in place with the following KPIs:

1. All new employees will train on modern slavery as part of the onboarding process.
2. We will undertake a modern slavery risk audit of all critical/tier 1 suppliers before the end of 2025.
3. We will expand our purchasing process to include signs to look out for when purchasing from non-critical suppliers.
4. We will create a Supplier Code of Conduct before the end of 2025.

Everything we are doing here at Feedback Medical to combat modern slavery and human trafficking is voluntary and reflective of the size of our organisation and the low-risk industry we work in. However, we acknowledge the importance of this work and commit to making steady improvements in this area.

## Board sign off

This statement was approved by the Board of Directors of Feedback Medical and signed on its behalf by Anesh Patel, Chief Financial Officer, on 4th March 2025.