
Modern Slavery and Human Trafficking Statement

Modern Slavery Act 2015

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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.

Our Company is committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the Company's operations based in the United Kingdom.

Organisational structure

We are a UK, London based, limited liability company formed in September 2014. Our principal business address is Imperial I-Hub Level 4, Imperial College London, 84 Wood Lane, London, England, W12 0BZ. We do business under the trading name Smart Respiratory. We are a Micro-size Enterprise (<10 Staff; <£1.7M Turnover; <£1.7M Balance Sheet).

Our policies on slavery and human trafficking

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In light of the obligation to report on measures to ensure that all parts of our business, franchise and supplier network are slavery free we have put in place a designated Anti-Slavery and Human Trafficking Policy. Our Anti-Slavery and Human Trafficking Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our franchise or supplier network.

Due Diligence on Modern Slavery and Human Trafficking

As a small business, we are committed to identifying and minimising the risks of modern slavery and human trafficking in our operations and supply chain. We implement the following practices:

Human Resource Practices

- We uphold policies that promote fairness, including an Equality & Diversity policy and basic grievance procedures, to ensure that employee rights are respected
- All employees are paid at least the National Minimum Wage or above

Supplier and Contractor Engagement

- We communicate regularly with our key suppliers and contractors to ensure they understand and align with our zero-tolerance stance on modern slavery and human trafficking. We conduct due diligence on our critical suppliers
- We assess potential risks related to slavery and human trafficking within our limited supplier network and rate, review our suppliers on an annual basis

Supplier and Contractor Compliance

We expect our critical suppliers and contractors to uphold our values against modern slavery. To this end, we:

- Request a commitment from our critical suppliers to collaborate with us in identifying and addressing any risks of slavery within our supply chain
- Track their responses annually to reinforce their compliance with our anti-slavery stance

Awareness and Training

- We aim to raise awareness of modern slavery risks within our business. We provide briefings to relevant staff and include anti-slavery practices as a topic for discussion in team meetings.

Key performance indicators

- Our organisation is committed to tracking and improving our efforts to tackle modern slavery by monitoring key performance indicators (KPIs) such as the number of employee and supplier training sessions conducted, percentage of suppliers screened for modern slavery risks, number of reported concerns or incidents investigated, and completion rate of our supplier audits each year. We will log these KPIs annually to measure progress and continuously improve our practices. All records related to these KPIs and our actions to address modern slavery will be kept on file as part of our compliance documentation.

Approved by



THOMAS ANTALFFY
MANAGING DIRECTOR

Date: September 20, 2025