

ATOM MEDICAL



Modern Slavery Statement 2025

About Atom Medical Corporation UK Ltd

Atom Medical Corporation UK Ltd provides a support only function to our UK distributor and their customers.

We are here to support the distributor to ensure our products can be used effectively to enhance patient care of newborn and premature babies. Our company philosophy is "to save a tiny baby's life".

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 to exploit them for personal or commercial gain.

Our commitment to the principles of the Modern Slavery Act 2015

Atom Medical Corporation UK Ltd has a zero-tolerance approach to modern slavery, and we are committed to acting with integrity in our business dealings. We expect the same standards from our business partners operating on our behalf in the UK. This statement applies to all people working for Atom Medical Corporation UK Ltd, this policy does not form part of any employees' contract of employment, and we may amend it at any time.

Responsibility for the policy

Atom Medical Corporation UK Ltd has overall responsibility for ensuring this policy complies with our obligations under the Modern Slavery Act 2015 and that all those under our control working for us in the UK comply with it.

Compliance with the policy

Atom Medical Corporation UK Ltd staff must ensure that they read, understand and comply with this policy. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify Mr Salvatore Bramato as soon as possible.

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Communication & awareness of this statement

Awareness of this statement forms part of the induction process for all individuals who work for us, updates will be provided using established methods of communication between the business and employees as required.

Our zero-tolerance approach to modern slavery must be communicated to business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this statement

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Atom UK may terminate their relationship with organisations or distribution partners working on our behalf if they are in breach of this policy. The terms of our Service Level Agreement are listed in the Supplier Code of Conduct.

Our Distribution and Supply Chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business as we use minimal procurement directly through our UK office. Procurement is predominantly administration services.

During 2025 we have mapped our Tier 1 suppliers and a fraction of our Tier 2 suppliers and confirmed that no significant risk was identified within the mapped suppliers. Furthermore, a vast majority (80%) of the mapped suppliers signed our Code of Conduct, which includes Modern Slavery Clauses and a brief Service Level Agreement.

Embedding the principles

We will continue to embed the principles through providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking. Ensuring staff involved in procurement activity for Atom Medical Corporation UK Ltd are aware of and follow modern slavery procurement guidance on GOV.UK adopting a zero-tolerance policy towards modern slavery.

During 2025 we developed our first set of KPIs to track our action with respect to tackling the management of modern slavery risks. Below is the detailed list of KPIs and our current progress.

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Category	KPI	Target	Current Performance
Policy & Governance	% of mapped suppliers receiving code of conduct and modern slavery policies	100%	100,00%
	% of mapped suppliers signing code of conduct and modern slavery policies	75%	80,00%
Supply Chain Management	% of suppliers contacted for self-assessment checklists annually	100%	100,00%
	% of suppliers completing self-assessment checklists annually	75%	80,00%
	% of suppliers holding at least some level of quality certification (ISO 9001, 14001, 45001, 13485 or similar)	75%	50,00%

During 2025 we completed our MSAT which will be updated annually in line with requirements, our objective being to improve our actions and outcomes based on the recommendations

This statement has been prepared by

Atom Medical Corporation UK Ltd.

For the financial year ending 31st September 2026

This statement will be reviewed and updated as required each year.

Signed By *Ichiro Matsubara*.....

Mr. Ichiro Matsubara President Atom Medical Corporation

Date..... *1st October 2025*.....