

**D.O.R.C. Limited**

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Subject : Statement of Compliance with Section 54 of the U.K. Modern Slavery Act

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## Introduction

Section 54 of the U.K. Modern Slavery Act 2015 provides information regarding organizations' efforts to address the issue of slavery and human trafficking. This statement has been prepared on behalf of DORC Limited. (the Company). This statement constitutes the Company's 2020 slavery and human trafficking statement which covers the period 1 January 2022 to 31 December 2022 and sets out the steps that we have taken to help ensure that modern slavery is not occurring in our business or in our supply chain.

We are committed to conducting our business activities in compliance with human rights laws globally and adhering to the basic human rights principles outlined in the United Nations Universal Declaration on Human Rights.

We fully support the intent of U.K. Modern Slavery Act 2015 and oppose human trafficking and slavery in all forms. We believe in the fundamental respect for human rights of all stakeholders and local communities in which the Company conducts business. We work to the highest professional standards to ensure that we comply with all laws and regulations applicable to the Company. The Company is committed to improving our practices to combat slavery and human trafficking within our own organization and within our external supply chain. We expect our suppliers to conduct business abiding to all applicable laws, rules and regulations. We are also committed to taking appropriate steps to tackle modern slavery (including slavery, servitude, forced or compulsory labor and human trafficking), and monitor our labor force and supply chains to identify and rectify any areas of concern in this regard, which may include terminating business relationships with organizations that knowingly engaged in practices that constitute modern slavery. No human rights violations by the Company or any director, officer, employee or person doing business on our behalf will be tolerated. All employees have an obligation to conduct business with integrity including respecting human rights.

## Organization's Structure

We are part of DORC International B.V., a company established in the Netherlands. D.O.R.C. Dutch Ophthalmic Research Center (International) B.V. exports its instruments and equipment to more than eighty countries worldwide and has its own sales and marketing organizations in Austria, Belgium, China, Finland, France, Germany, Italy, the Netherlands, Norway, Spain, Sweden, UK, USA. As we take this commitment seriously, our Global Corporate Social Responsibility (CSR) strategy is endorsed and ingrained at the highest level in DORC. It is central to how we want to run our business. We focus our CSR work in five key areas:

- Customer Focus & teamwork
- Sustainable innovation & operations
- Compliance & accountability
- Diversity
- Community engagement

## Corporate Governance Policies

DORC's strong system of internal controls enables the management team to comply with corporate policies and applicable laws and regulations. For many years, we have conducted annual corporate governance training to ensure our employees stay informed, up-to-date and in compliance with our Corporate Governance policies including our:

- Standards of Business Conduct, which includes our commitment to the following standards among others:
  - Competitive Practices: We will engage only in fair and open competition in compliance with applicable laws, rules and regulations.
  - Integrity of Business Records and Reporting: We will record and report all data and information accurately, honestly, and in sufficient detail.
  - Dealing with Government Official: We are committed to complying with the letter and spirit such as the UK Bribery Act 2010.

- International Transactions: We will abide by all applicable laws, rules and regulations when conducting international transactions.
  - Quality Standards and Assurance: We will perform services and manufacture products with a commitment to a high level of quality.
  - Conflicts of Interest: We will avoid conflicts of interest.
  - Equal Opportunity Workplace Environment: We will act with respect and consideration.
  - Health, Safety and Environmental Protection: We will be sensitive to the effects of our operations on the environment and will strive to prevent injury and illness in the workplace.
  - Reporting Questionable Practices: We will encourage employees to ask questions and report potential compliance concerns.
- Business Ethics Reporting Policy
  - Global Anti-bribery Policy

These policies apply to all DORC International B.V. employees, officers and directors. Certification on an annual basis that they have received, read, and been trained on these policies (annually) is required. DORC International B.V. is committed to adhere to the highest standards of ethics and integrity in all of our interactions with patients, health care providers, customers, fellow colleagues and other key stakeholders. DORC International B.V. vigorously enforces these policies and will take prompt and appropriate action, up to and including termination of employment or other relationship, of those found to be in violation.

## Labor Standards Assurance System

The Labor Standards Assurance System (**LSAS**) has been developed by NHS Supply Chain, in conjunction with the Department of Health and industry bodies. LSAS provides an extra level of corporate, social and ethical governance with regard to labor standards, marking a major but progressive change in its procurement methodology. In July 2017, DORC International B.V. achieved Level 2 accreditation of LSAS. In 2021 the Company successfully maintained Level 2 accreditation of LSAS.

We have registered with and completed the UK Government Slavery Modern Assessment Tool to improve protections and reduce the risk of exploitation of workers in their supply chains and have obtained "green" status.

The Company's Labor Standards Assurance System Policy (**LSAS Policy**) reflects our commitment to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to help ensure slavery and human trafficking is not taking place in our supply chains.

Training on LSAS and the LSAS policy forms part of the induction process for all individuals who work for the Company, and periodically thereafter. In addition, the LSAS policy is publicly available on the Company's website. This policy shall also be communicated to key suppliers, contractors and business partners of the Company, specifically those that are connected to the UK Surgical Business. Conducting periodic training on LSAS and the LSAS policy with employees helps them take ownership and accountability for doing their part to create a culture of awareness, a high level of understanding of the risks of modern slavery and human trafficking and compliance to help ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. (source:

[https://dorcglobal.com/assets/content/pdf/DORC%20LSAS%20Policy\\_rev04\\_31-03-2020.pdf](https://dorcglobal.com/assets/content/pdf/DORC%20LSAS%20Policy_rev04_31-03-2020.pdf))

## Supply Chain

### Supplier Evaluation, Qualification, and Verification

DORC International B.V. uses a risk-based assessment process for evaluating, verifying and selecting direct suppliers. This qualification process may include supplier questionnaires or audits of supplier facilities, which may be completed by DORC International B.V. or a third party, following which DORC International B.V. verifies each direct supplier through the completion of a supplier risk assessment. DORC International B.V. expects all of its suppliers to abide by all applicable laws and regulations and maintain the highest ethical standards.

## Supplier Agreements and Certification

In its supply agreements and other arrangements with its direct suppliers, DORC International B.V. includes provisions requiring such direct suppliers to comply with applicable laws and regulations, including as relates to the products or materials being supplied.

## Supplier Audits

DORC International B.V. regularly conducts audits of its suppliers for compliance with applicable law and regulations and good manufacturing standards, as well as the performance of obligations and compliance with supply agreements. DORC International B.V. may conduct these audits directly or may utilize a third party.

## Future

The Company is committed to continually demonstrate additional improvements and enhancements to our processes, which includes ongoing training and further development of initiatives to raise awareness amongst its employees. We have maintained our Level 2 accreditation of LSAS with completion of annual LSAS audit and we continue to aim to demonstrate additional improvements and enhancements to our processes. It is our belief that the process and KPI's that form part of Level 2 accreditation of LSAS will enhance our visibility and ability to identify modern slavery and human trafficking risks.

The Company strives to continuously improve our management systems and our performance in the areas of labor standards, environmental health and safety, and encourages the same from our suppliers. The Company continually reviews its LSAS Policy to help ensure an evolution of our approach to modern slavery and human trafficking risks.

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 financial year ending 31 December 2022.