

Human Rights Policy

Document owner: Ryan Rodrigues, Director

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Approval: Ryan Rodrigues, Director

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1. Purpose and Commitment

Anaiah Healthcare is committed to respecting internationally recognised human rights, including the Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. We comply with applicable UK legislation, including the Modern Slavery Act 2015.

We have a zero-tolerance approach to modern slavery and human trafficking and are committed to preventing these practices throughout our operations and supply chains.

We take a proportionate, risk-based approach appropriate to our business. We aim to avoid causing or contributing to adverse human rights impacts through our activities, address any impacts that occur, and use our influence to prevent or mitigate impacts directly linked to our operations, products or services through our business relationships.

2. Scope and Responsibilities

This policy applies to all Anaiah Healthcare employees, including permanent, fixed-term and agency workers, contractors and consultants. It also sets expectations for our suppliers, manufacturers, distributors, agents, logistics providers and other business partners, who are expected to uphold equivalent human rights standards within their own operations and supply chains.

Ryan Rodrigues, Director, has overall accountability for this policy and is responsible for its implementation, including supplier checks, staff communication and monitoring. Everyone covered by this policy is responsible for complying with it and reporting concerns.

This policy is publicly available and communicated to relevant personnel and business partners.

3. Dignity, Equality and Non-Discrimination

We treat everyone with dignity, fairness and respect. Discrimination, harassment, bullying, victimisation and other unfair treatment are prohibited, including on grounds of age, disability, race, ethnic or national origin, religion or belief, sex, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy or maternity, or other personal characteristics protected by law.

We are committed to equal access to employment, training, promotion and development opportunities and will take appropriate action to address concerns.

4. Labour Rights, Modern Slavery and Health and Safety

We respect fundamental labour rights, including freedom of association, the effective recognition of collective bargaining, the elimination of forced and child labour, non-discrimination and the right to a safe and healthy working environment.

We pay workers lawfully and punctually, respect applicable working-time and rest requirements, and do not retain identity documents, charge workers recruitment fees or restrict workers' freedom to leave employment after reasonable notice.

We prohibit forced, bonded or compulsory labour, human trafficking, unlawful child labour, debt bondage, coercive or deceptive recruitment, and any practice that exploits or endangers workers.

We are committed to providing a safe and healthy working environment for employees, contractors, visitors and others affected by our activities. We comply with applicable health and safety legislation, assess

workplace risks, provide appropriate information, training and equipment, and encourage the reporting of hazards and concerns without fear of retaliation.

5. Supply-Chain Due Diligence

We expect our suppliers and business partners to respect human rights and maintain appropriate labour standards throughout their operations and supply chains.

Our risk-based approach includes:

- **Supplier checks:** Maintaining records of key suppliers and identifying potential higher-risk relationships, including overseas manufacturing and the use of labour agencies.
- **Onboarding:** Asking new suppliers about their labour practices and requesting relevant human rights or modern slavery policies or statements where available.
- **Contractual requirements:** Including appropriate human rights and anti-slavery requirements in supplier agreements where practical, including prompt notification of suspected or actual breaches.
- **Ongoing monitoring:** Discussing labour standards with key suppliers and remaining alert to warning signs, such as unexplained low prices or significant changes in labour arrangements.
- **Corrective action:** Assessing concerns, prioritising worker safety and, where appropriate, agreeing and monitoring corrective measures with suppliers. We may suspend or terminate relationships where serious concerns cannot be adequately addressed, taking account of the potential impact on affected workers.

Where we cause or contribute to an adverse human rights impact, we will take steps to remedy it. Where an impact is directly linked to our operations through a business relationship, we will use our influence to seek to prevent or mitigate it.

6. Raising Concerns and Remediation

Employees, contractors, suppliers, supplier workers and other affected stakeholders may report concerns about human rights, modern slavery, discrimination, harassment, labour standards or unsafe working conditions to:

Ryan Rodrigues [Director, Tel: 01843 448538, Email: ryanr@anaiahhealthcare.com]

Where a concern involves Ryan Rodrigues, it may be raised directly with Vaman Parab [vamanp@anaiahhealthcare.com].

We will take concerns seriously, assess them promptly and impartially, and maintain confidentiality as far as reasonably practicable. We will protect individuals who raise concerns in good faith from retaliation or detrimental treatment, prioritise the safety of affected people, and seek specialist advice or refer matters to the relevant authorities where appropriate.

Appropriate action may include disciplinary measures, corrective action with suppliers and, where Anaiah Healthcare has caused or contributed to harm, providing for or cooperating in appropriate remediation.

7. Privacy, Freedom of Expression and Community Impact

We respect lawful freedom of expression and the privacy of employees, customers, suppliers and other stakeholders. Any restrictions on expression will be proportionate and reasonably necessary for legitimate business, confidentiality or safety reasons.

Personal data is processed lawfully, fairly and transparently in accordance with applicable data protection legislation, with appropriate safeguards against unauthorised access, loss, misuse or disclosure.

Where our activities affect local communities, we seek to engage respectfully with relevant stakeholders and take reasonable steps to avoid adverse impacts on health, safety, livelihoods, cultures and access to essential services, paying particular attention to vulnerable groups.

8. Communication, Monitoring and Review

This policy is explained to new employees during onboarding. Periodic refresher communications reinforce awareness of human rights risks and reporting procedures. The policy is shared with suppliers and business partners on request.

The Director monitors its implementation, including concerns raised and relevant supplier issues. We are committed to continuous improvement and will review this policy at least annually, updating it as necessary to reflect changes in legislation, our business, supply chains, stakeholder feedback and recognised good practice.