

Anti-slavery and human trafficking Statement

Company name: TidalSense Limited ("TidalSense")

Company number: 08500211 (registered in England).

Applicable period: 1st January 2024 to 31st December 2024

1. Introduction

Modern slavery (or modern-day slavery) is a human rights violation and has severe consequences for the health and wellbeing of survivors. It is an exploitative crime that impacts on physical and mental health and has public health implications. TidalSense is committed to ensuring that all of its business operations and supply chains are free from involvement with modern slavery. TidalSense takes a zero-tolerance approach to any form of slavery, servitude, forced or compulsory labor, and human trafficking, as defined by the Modern Slavery Act 2015 (the "Act").

TidalSense has implemented a Modern Slavery Policy, reflecting its commitment to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains. The policy outlines how the various practices, policies and procedures ensure compliance with its commitments and legal obligations.

2. Commitment

TidalSense acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Act. While TidalSense is not required to produce an annual statement under the Act, the organization chooses to do so voluntarily as demonstration of its commitment to preventing modern slavery. We understand that this requires an ongoing review of both internal practices in relation to our labour force and also our supply chains.

TidalSense does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to TidalSense for the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to our responsibilities under relevant employment legislation in the UK and in many cases exceed those minimums in relation to our employees.

3. Organisational structure, business and supply chains

TidalSense is a respiratory medical device manufacturer of hardware, software and artificial intelligence medical devices. The company was founded in 2013 and is headquartered in Cambridge UK. TidalSense works with organisations across the respiratory care spectrum, from healthcare providers (e.g. the NHS) to the pharmaceutical industry (to support new medicines development).

TidalSense's supply chain, associated with the manufacture of medical devices under an ISO 13485:2016 quality management system, requires that there is traceability of sub-assemblies and components through our suppliers and their suppliers. As a result, contractual obligations are placed on our first-tier suppliers to ensure that required standards flow through the entirety of the supply chain. Contracts with suppliers of direct materials include provisions on the issue

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of modern slavery. TidalSense's standard position is a request for the supplier to provide a copy of their modern slavery policy for review by TidalSense.

TidalSense has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery. However, in event that we do uncover a potential case of modern slavery in our supply chain, TidalSense would work with the relevant supplier to investigate the claim and where possible work with the supplier to rectify the situation. If this is not possible, then we would seek to terminate the relationship in line with contractual terms.

In the period covered by this statement, there have been no incidents of modern slavery reported by or to TidalSense.

4. Risk Assessment and due diligence

As a medical device manufacturer of regulated devices, we have assessed the risk of modern slavery in our operations to be low. There have been no areas of high risk identified in any TidalSense operations or supply chain. Nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to us. TidalSense considers its main exposure to risk of modern slavery to exist within its medical device supply chain in south-east Asia because it involves the provision of labour in a country where protection against breaches of human rights may be limited. This supply chain is subject to the strict supplier controls in our ISO 13485:2016 quality management system, as detailed above.

5. Policies

TidalSense has implemented a Modern Slavery Policy, reflecting its commitment to combatting slavery and human trafficking and to acting with integrity in all its dealings, relationships, and supply chains. The policy outlines how the various practices, policies and procedures ensure compliance with its commitments and legal obligations. In addition,

Notably, TidalSense is committed to:

- Implementing effective systems to prevent, detect, and respond to modern slavery risks in its business operations and supply chains.
- ensuring that slavery and human trafficking is considered and addressed in the company's approach to corporate social responsibility;
- ensuring that any concerns about slavery or human trafficking can be raised through the company's whistleblowing procedure;
- carrying out regular audits to ensure that all employees are paid at least the National Minimum Wage and have the right to work in the UK;
- ensuring that the company imposes an obligation on its suppliers to operate in accordance with the Modern Slavery Act 2015;
- identifying and minimising any areas of high risk in the company's business operations and/or supply chain; and
- providing training for all employees who are involved in the supply chain on issues relating to slavery and human trafficking.

6. Training and Awareness

TidalSense is committed to ensuring that all staff involved in supplier selection and management, and in business operations involving third-party organisations receive training with regards to modern slavery, and that the effectiveness of training is assessed.

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7. Key progress and effectiveness

This is the first anti-slavery and human trafficking statement being issued by TidalSense. Progress for 2025 will be measured with reference to the applicable period of this statement.

8. Next steps

Over 2025, TidalSense will look to prioritise the following activities:

- Introduce additional due diligence processes in relation to modern slavery for all prospective (and existing) suppliers within our quality management system, including conducting compliance reviews of controls we put in place for first-tier suppliers.
- Develop additional training for employees and contractors who are involved in managing supplier relationships, to enable them to recognise risk factors more easily;
- Continue to risk-assess and monitor risks associated with modern slavery in our business operations and supply chain;
- Continue to provide guidance and support to help our employees understand their rights and responsibilities under the company's Modern Slavery Policy and relevant legislation. Additional support will be provided to managers and supervisors to enable them to deal more effectively with matters arising from these.

This statement was reviewed and approved by:



Ameera Patel
CEO