

## Modern Slavery Statement

### Financial year ended 31st December 2024

#### Our Position

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Kuro Health Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Kuro Health Limited has a zero-tolerance approach to modern slavery and human-trafficking and we are committed to understanding the risks within our business and supply chains and taking proactive action.

#### Scope

This statement applies to Kuro Health Limited and subsidiaries (collectively “Kuro Health”), individually listed as Kuro Health Services Limited, Premier Medical Group Limited, Rehab-Link Limited, Mobile Doctors Limited and Warp Technologies Limited.

This statement applies to all employees, officers, consultants, contractors, casual workers and agency workers (“Workers”). This statement does not form part of any employee’s contract of employment and it may be amended at any time. We reserve the right to vary this statement, including any time limits, as appropriate in any case. All Workers must ensure that this statement is read, understood and complied with.

#### Our Business

Kuro Health is a group of companies providing medical reporting, screening, rehabilitation and diagnostic services mainly to the personal injury and insurance markets. We also provide software solutions. Our services are solely provided to other UK businesses. Our supply chains include professional service companies, such as medical experts/clinicians, solicitors, insurers, employment agencies and contract maintenance and cleaning services. All of our suppliers are located in low-risk areas according to the Global Slavery Index 2023 and are engaged in low risk sectors.

#### High Risk Areas

Based upon the services we provide, we have deemed that the risk of slavery within our business is low. As outlined below, we have a number of policies and procedures which enable us to mitigate the risk of slavery within Kuro Health and we are committed to continuing to ensure that the risk remains minimal.

Our highest-risk areas are those where contract services are provided, given that these involve the direct supply of human resource.

Whilst we acknowledge that risks could exist beyond our direct suppliers, we regularly vet and screen all suppliers to ensure that they and their supply chains operate responsibly and in accordance with the Modern Slavery Act 2015.

#### Tackling Modern Slavery

We will not willingly or knowingly conduct business with any organisation that is in any way involved in slavery or human trafficking. Steps taken to manage the risk include:

- Using compliance monitoring tools to ensure that a particular organisation has never been convicted of offences relating to modern slavery.
- Before entering into a contract with any supplier, appropriate due diligence is carried out in line with the KHL-011 New Supplier Policy and Procedure, to ensure those we do business with have their own appropriate controls.
- Contracts are put in place with suppliers containing provisions in respect of having appropriate policies in relation to and adhering to laws, statutes, regulations and codes, including but not limited to the Bribery Act 2010, Equality Act 2010 and Modern Slavery Act 2015.
- Regular supply chain audits are carried out to check for instances of fraud, terrorism, sanctions, financial performance, adverse media or other relevant charges.
- Raising the awareness of our staff through regular mandatory training and publicity.
- Carrying out detailed recruitment/existing employee vetting and screening.
- Publishing this statement on our website with links to our relevant policies.
- Undertaking a review of Kuro Health on the Walk Free Foundation's Modern Slavery Benchmarking Tool at least annually and acting on any recommendations.
- Utilising 'Stronger Together' resources and training.
- Our company-wide risk management framework and reporting processes are designed to support the escalation and management of any identified issues.

Through the implementation of the above controls we have sought to assure ourselves that our supply chain adhere to their own obligations, and we have not identified any incidents of Modern Slavery or Human Trafficking within it.

## Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies are reviewed and updated annually and include (but are not limited to):

- Modern Slavery and Human Trafficking Policy. This policy sets out our stance on modern slavery and explains how employees can identify any instances of this and where they can go for help. Since the last iteration of the policy, it has been re-assessed against the Walk Free Foundation's Modern Slavery Benchmarking Tool and updated in line with the recommendations therein.
- Employment Vetting and Screening Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Speak-Up Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

## Responsibility

The Kuro Health Limited Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Directors are also responsible for the setting of goals and Key Performance Indicators (KPIs) for the purpose of monitoring and continuous improvement. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given appropriate and regular training on it and the issue of modern slavery in supply chains.

In the event that a suspected case of modern slavery is identified, the report is escalated to the Head of Corporate Services who is responsible for seeking expert counsel and alerting the relevant authorities.

## Staff Training and Awareness

We closely monitor developments in modern slavery legislation and guidance via horizon scanning mechanisms. We use this to update our internal policies and communicate across the entire group and suppliers where appropriate.

We seek to embed our policies through staff training, along with participating in publicity campaigns to raise awareness at all levels of the organisation. We do this as part of our wider commitment to operating ethically and corporate social responsibility.

All employees throughout the organisation are required to undergo role-appropriate training in this area upon induction to the business and annually thereafter.

## Continuous Improvement

We have conducted an in-depth review of the Home Office's Transparency in Supply Chains: A Practical Guide (2025), along with the Walk Free Foundation's Modern Slavery Benchmarking Tool and will be implementing the following recommendations over the coming year:

- Engage with external stakeholders to further map out the supply chain structure and relationships with suppliers and subcontractors.
- Create a high-level profile of direct and indirect suppliers.
- Carry out an updated, dedicated risk assessment of our current Modern Slavery and Human Trafficking standing.
- Review our mechanisms for remediation for victims, in the event an incident is identified.
- Increase engagement with peer-learning groups and collaborative initiatives.

## Goals and Key Performance Indicators

Our goals for the next 12 months are to:

- Assess current levels of staff understanding of our Modern Slavery and Speak Up policies via an online survey.
- Improve staff understanding and awareness. We will monitor this via annual assessment scores.

## Approval

This statement has been approved by the Board of Directors and will be updated and published annually in line with the Modern Slavery Act 2015.

**Date of Approval:** 10th June 2025

Signed on behalf of the Kuro Health Limited Board by Dr Harry Brunjes, Chairman

