

## Modern Slavery Statement - Financial year ended 31<sup>st</sup> December 2025

### 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. This forms part of our broader commitment to ethical business and ESG principles and we require suppliers to adhere to equivalent standards.

### 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.

### 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:

#### Direct suppliers

- Medical experts, rehabilitation and diagnostic providers, software and technology providers, professional services, cleaning, security and other key stakeholders.

#### Indirect suppliers

- Subcontractors, outsourced support services and technology infrastructure providers used by direct suppliers.

### High Risk Areas

Our high-risk areas are those where contract services are provided, given that these involve the direct supply of human resource. We acknowledge that risks could exist beyond our direct suppliers, however we ensure that we regularly vet and screen all suppliers to ensure that they 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 offenses 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 controls in place.
- Contracts 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 carried out to check for instances of fraud, terrorism, sanctions, financial performance, adverse media or other relevant charges.
- Raising the awareness of all members of staff through annual 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.

## 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:

**Modern Slavery and Human Trafficking Policy.** This policy sets out the organisation's 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 reassessed against the Walk Free Foundation's Modern Slavery Benchmarking Tool and updated in line with the recommendations.

**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.

## Actions taken in 2025

As part of our commitment to help tackle modern slavery, we implemented the following actions in 2025:

- Engaged with medical experts, who are our key suppliers, to improve our understanding of their use of subcontractors and applied additional due diligence where appropriate.
- Mapped and risk assessed our direct supply chain in November 2025.

- Implemented specialised mandatory training for those in senior management or procurement roles. This is completed on an annual basis, along with an assessment to test comprehension of the module material. 100% of the colleagues who completed the training passed the assessment.
- Engaged with peer-learning from Stronger Together.

These have allowed us to better understand the risk within our own supply chain.

In this reporting period, we have not identified any instances of Modern Slavery or Human Trafficking within our supply chain.

## **Risk assessment**

Kuro Health carries out an annual Modern Slavery and Human Trafficking risk assessment in November. Overall risk remains low geographically as most suppliers are UK-based. There is a limited, moderate-risk exposure in some sectors such as cleaning and security. All services used in these areas have robust employment vetting and screening policies in place, which helps to mitigate the associated risks.

Further, through our robust due diligence processes, training and internal education controls, Kuro Health manages and reduces the risk of modern slavery occurrences within our supply chain, as well as being able to effectively identify and respond to any suspected instances of modern slavery or human trafficking.

## **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.

If a suspected case of modern slavery is identified, the report is escalated to the Corporate Services Director who is responsible for seeking expert counsel and alerting the relevant authorities. We are committed to working with relevant authorities and organisations to ensure appropriate remediation and support for affected individuals.

## **Staff Training and Awareness**

We closely monitor developments in Modern Slavery and corporate sustainability legislation and guidance via horizon scanning mechanisms within Kuro Health Limited. Internal policies are updated and communicated to across the entire group and suppliers where appropriate.

All employees throughout the organisation are required to undergo role-appropriate training in Modern Slavery and Human Trafficking upon induction to the business, and annually thereafter.

## Continuous Improvement

We have reviewed in depth the Home Office's Transparency in Supply Chains guidance, along with the Walk Free Foundation's Modern Slavery Benchmarking Tool and will be implementing the following recommendations over the coming year:

- Continued engagement with stakeholder, peer learning groups and collaborative initiatives.
- Continue to risk assess our supply chain on an annual basis, with a view to extend beyond tier 1 suppliers.

## Goals and Key Performance Indicators

Our goals for the next 12 months are to:

1. Apply enhanced due diligence to 100% of identified higher-risk suppliers (e.g. cleaning, BL1 8PB security).
2. Engage with key direct suppliers to map second-tier suppliers.
3. Maintain zero substantiated modern slavery incidents.
4. Ensure 100% of staff are aware of Speak-Up mechanisms.
5. Participate in at least one external initiative or peer-learning forum.
6. Complete annual assessment using Walk Free benchmarking tool.
7. Implement at least two improvement actions identified through benchmarking.

## 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:** 22nd June 2026

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

