

Modern Slavery and Human Trafficking Policy

JenaValve Production Limited

Effective Date: January 26, 2026

Last Reviewed: January 26, 2026

Approved By: Managing Director, John Kilcoyne

MODERN SLAVERY ACT STATEMENT FOR FROM 1 JANUARY 2026 TO 31 DECEMBER 2026

INTRODUCTION

This Modern Slavery Act Statement (“Statement”) is made pursuant to Part 6, Section 54 of the UK Modern Slavery Act 2015 (Transparency in Supply Chains) and applies to the follow legal entities:

1. JenaValve Production Limited

JenaValve Production Limited (“Company”) is fully committed to conducting business with integrity, ethics, and respect for human rights. We recognize that modern slavery, including slavery, forced or compulsory labor, servitude, human trafficking, debt bondage, and child labor, represents a serious violation of human rights and is a global issue. As such, we are fully committed in our efforts to reflect our business activities to our commitment to human rights and labor rights.

The principles referenced in JeneValve’s Position Statement on Human Rights are reflected in our employment, ethics, and procurement policies, which are designed to promote, protect, and respect human rights within the Company and with our suppliers. We adopt a **zero-tolerance approach** to all forms of modern slavery and human trafficking. We are dedicated to preventing such practices in our own operations and throughout our supply chains. This policy aligns with applicable laws, including the UK Modern Slavery Act 2015, and similar international standards.

We have prepared this statement as a joint statement of the actions taken by the Company to address modern slavery risk as the Company globally operates across the same sector and product lines, manufactures, and distributes products from the Company owned and operated manufacturing facilities and operates under similar policies, procedures and risk mitigation measures across all relevant geographies. This statement has been prepared in

consultation with our supply chain, compliance, commercial, human resource, and finance teams.

Our Structure and Business

Jenavalve Production Limited is headquartered in Leeds, UK. Our mission is to advance the treatment of heart conditions. Primary purpose of our business in the UK is to:

-manufacture heart valve for treating the disease of aortic regurgitation

Supply Chain

Our supply chain includes suppliers of components, materials, manufacturing services, and other goods/services essential to our medical device operations.

- **Supplier Requirements:** Suppliers must confirm compliance with all applicable anti-modern slavery laws and commit to ensuring no modern slavery occurs in their operations or supply chains. We require suppliers to:
 - Allow reasonable audits or assessments where risks are identified.
 - Cascade these requirements to their own suppliers.
- **Risk-Based Approach:** We prioritize due diligence on higher-risk suppliers (e.g., those in regions or sectors with elevated modern slavery risks, such as electronics or raw materials sourcing).
- **Consequences of Breach:** If a supplier is found to engage in or tolerate modern slavery, or fails to address identified risks, we reserve the right to terminate the relationship and pursue appropriate remedies.

Policies, Employee Training, and Due Diligence Process

The Company take steps to ensure modern slavery does not occur within our business:

- **Recruitment and Employment Practices:** We only use specified, reputable recruitment agencies to source labor. All employees receive written contracts compliant with applicable labor laws, fair wages paid directly and on time, and entitlements to rest breaks, holidays, and safe working conditions.
- **Risk Assessment:** We regularly assess risks of modern slavery in our operations, recruitment, procurement, and global activities.
- **Training and Awareness:** Employees receive a copy of this policy upon commencement and during periodic reviews.

- **Due Diligence:** We perform due diligence on our direct operations, including audits and monitoring of employment practices.

5. Reporting Concerns and Protection

- **Reporting Mechanism:** Any employee, worker, supplier, or third party with suspicions or knowledge of modern slavery in our operations or supply chains must report it immediately to HR or through our confidential whistleblowing channel (details available in our Whistleblowing Policy).
- **Investigation:** Reports will be promptly and confidentially investigated by HR, with escalation to the Ethics Committee or senior management as appropriate. Actions may include remediation, reporting to authorities, or supportive measures for victims.
- **Non-Retaliation:** We guarantee protection from detrimental treatment for anyone raising genuine concerns in good faith, even if later found mistaken. If you believe you have experienced retaliation, report it immediately (refer also to our Grievance and Whistleblowing Policies for employees).

6. Continuous Improvement

We are committed to ongoing enhancement of our practices, including annual reviews of this policy, risk assessments, and effective monitoring. Feedback from stakeholders, including suppliers and employees, informs improvements.

This policy will be communicated to all relevant parties and made publicly available on our website.

Signed:

John Kilcoyne, Managing Director

JenaValve Production Limited

Date: January 26, 2026


John Kilcoyne (Jan 27, 2026 13:00:55 EST)