



## **Modern Slavery Act Statement**

The following sets forth the steps that BVI Group Limited and its subsidiaries (hereinafter "BVI") have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain. BVI has a zero tolerance approach to any form of modern slavery, servitude, human trafficking or forced labour. BVI is committed to acting ethically and with integrity and transparency in all business dealings, including establishing effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

BVI is a leading global developer, manufacturer, and marketer of ophthalmic and other specialised microsurgical products. BVI's corporate headquarters is located in Waltham, MA (USA). BVI distributes products in over 97 countries worldwide and operates manufacturing facilities in the United States, United Kingdom, Mexico and China. BVI offers products and services for all aspects of ophthalmic surgery, including cataract, refractive, oculoplastic and vitreoretinal sub-specialties as well as other specialty microsurgery procedures.

### **Our policies**

BVI operates a number of internal policies, including our Business Code of Conduct, to ensure that we are conducting business ethically and with integrity in all of our business relationships in order to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chain.

### **Our suppliers**

BVI operates a supplier policy and maintains an approved supplier list. Globally, we conduct due diligence activities on all suppliers before allowing them to become an approved supplier. This due diligence includes regular detailed desktop audits and audits through the Labour Standards Assurance System ("LSAS") that request specific information concerning labour standards. In addition, periodic supplier visits and on-site audits are conducted. If, through any of these activities, we identify any risks, a formal investigation will be conducted which may result in a request for immediate corrective action from the supplier, which ultimately could result in disqualification from our approved supplier listing.

In addition to the above, BVI requires its suppliers to confirm that:

- They provide a workplace for employees that is free from discrimination, harassment or any other form of abuse.
- All employees are treated fairly with respect to wages, working hours and benefits.
- All forms of child forced or compulsory labor is prohibited.
- All employees' right to freedom of association and collective bargaining consistent with local laws are respected.
- Safe and healthy working conditions are provided.
- Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.
- We may terminate the contract at any time should any instances of modern slavery come to light.

### **Training**

BVI regularly conducts training on its policies and procedures.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and constitutes BVI's slavery and human trafficking statement for the financial year ending 31st December 2025.

A handwritten signature in blue ink, appearing to read "Andrew Dawson".

**Andrew Dawson**  
Chief People Officer & Head of Corporate Affairs

A handwritten signature in blue ink, appearing to read "Sean Richardson".

**Sean Richardson**  
Director