



Addendum to Parent Company Joint Modern Slavery Report 2025

For Jaeger Medical UK Limited, a UK Operating Company of Trudell Medical Limited

Date: 1st July 2025

Financial Year Ending: 31st March 2025

This Addendum is published pursuant to section 54(1) of the **UK Modern Slavery Act 2015** and applies to **Jaeger Medical UK Limited** (the "Company" or "Jaeger"), a company incorporated and operating in the United Kingdom, and a wholly owned operating company of **Trudell Medical Limited** (the "Parent").

Use of Parent Company Modern Slavery Statement

Jaeger has chosen to adopt and reference the **Joint Forced Labour / Child Labour Report** ("Modern Slavery Statement") published annually by the Parent for the financial year ending 31st March 2025. The Modern Slavery Statement sets out the group-wide policies, due diligence procedures and actions taken to address the risks of modern slavery within its operations and supply chains.

The Modern Slavery Statement can be found at:

<https://www.jaegerdx.com/intl/en/trudell-companies-modern-slavery-statement-2025>

Application to Jaeger

1. Statement

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'.

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

2. Organisational Information

Jaeger Medical, a subsidiary of Trudell Medical Group, is a global leader in respiratory diagnostics with a heritage of more than 70 years in pulmonary function testing innovation. Headquartered in Höchberg, where the company was originally founded, Jaeger Medical designs, manufactures, and supplies advanced respiratory diagnostic equipment used by



healthcare professionals worldwide. The company operates in over 100 countries through a combination of directly employed specialist teams and a well-established international partner network, ensuring consistent service, technical expertise, and product support across diverse healthcare markets. Jaeger Medical maintains a strong focus on quality, precision, reliability, and responsible business practices across its international operations and supply chains.

3. Our Supply Chain and Procurement

Jaeger works with over 200 Tier 1 suppliers, of which only 2 are identified as medium risk and none as high risk.

The supplier base is concentrated in low-risk countries, primarily Germany and the United States, with the remainder distributed across a small number of other European countries and Australia. The 2 medium risk suppliers are based in China.

Jaeger are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks.

We ensure we carry out supplier due diligence.

This includes:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify geographical areas of higher risk
- Requiring suppliers, as part of the contract, to adhere to modern slavery policies and principles

We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices.

Such as:

- Aggressive pricing that doesn't consider sustainable production costs
- Short lead times and late high-volume orders
- Inaccurate forecasting



- Late of extended payments
- Withdrawing from contract at the last minute
- Enforcing unfair penalties for not meeting orders
- Making last minute changes to order specifications or volumes
- Providing inaccurate specifications

4. Areas of risk identified within the business and supply chain

Manufacturing and electronics account for 123 suppliers and 1 supplier identified in Logistics, which are categorised as heightened risk by sector classification, while the remaining 120 suppliers fall within standard risk categories.

Supplier risk assessment:

- The risk level is determined using the scale according to the global slavery index. <https://www.globallslaveryindex.org>
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour.
- <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

Findings:

1. 2 suppliers identified as medium risk
2. 0 High Risk suppliers on the list
3. 123 suppliers are in manufacturing, and 1 is in logistics both identified risk factors

Assessment Criteria:

- 0 or 1 Risk factors – Low Risk
- 2 Risk factors – Medium Risk
- 3 Risk factors – High Risk

Tier 1

Overall, the data indicates a low-risk supplier profile, providing a clear and robust baseline for proportionate ongoing monitoring and assurance.

This risk level will be reviewed yearly and reported on.



KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been.

Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

1. The number of modern slavery cases identified and remediated
2. Update of the Modern Slavery Statement and completion of the MSAT yearly
3. Number of suppliers committing to the Supplier Code of Conduct
4. Completion rates for modern slavery awareness training

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

4. Reporting

If a case of Modern Slavery is suspected, then the following is advised.

1. A suspected victim of modern slavery is not to be confronted directly as this may endanger them.
2. If an immediate risk to life, then call local emergency (e.g. 911 in the US, 112 in Europe, 999 in the UK).
3. If there is no immediate risk to life, then contact the national helpline or report it online.

Helplines and On-line Reporting

Country	Helpline	Phone	On-line
EU	Anti-trafficking hotline		https://help.unhcr.org/hungary/wp-content/uploads/sites/86/2022/04/trafficking-hotlines.pdf



UK	Modern Slavery Helpline	08000 232 700	https://www.modernslaveryhelpline.org/report
US	National Human Trafficking Hotline	1-888-373-7888	https://humantraffickinghotline.org/en/report-trafficking

Employees are required to take their suspicions to their line manager or use the [Ethics Hotline](#)

5. Responsibility

Document here who has responsibility for this statement – this may be different people in different departments or one person at senior management level. Eg.

- *Senior VP Global Operations*
- *Chief Human Resources Officer*
- *Healthcare Compliance Officer*
- *Managing Director*

6. Review and Communication

This statement will be reviewed and signed by a director and published on our website.

Jaeger confirms that:

- It is part of the same group covered in the Trudell Companies - Modern Slavery Report FY Ending March 2025 and it adheres to the group-wide policies and procedures it outlines
- It prohibits the following 11 International Labour Organisations forced labour indicators: -
 1. Abuse of Vulnerability
 2. Deception
 3. Restriction of movement
 4. Isolation
 5. Physical and sexual violence
 6. Intimidation and threats
 7. Retention of identity documents



8. Withholding of wages
9. Debt bondage
10. Abusive working and living conditions
11. Excessive overtime.

7. Compliance with the UK Modern Slavery Act 2015

This Addendum is intended to ensure compliance with the UK Modern Slavery Act 2015 and to transparently demonstrate the Company's commitment to preventing modern slavery and human trafficking in all forms.

8. Board / Senior Management Approval

SIGNED:

A handwritten signature in black ink, appearing to read "Gerald Slemko".

NAME: Gerald Slemko

JOB TITLE: Chief Executive Officer

DATE: 1st July 2025