



# Modern Slavery and Human Trafficking Statement

## Corify Care S.L Financial Year 2025–2026

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Version: 1.0

Date	Revised by	Notes
6 April 2026	Mathew Powell	

## 1. 1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Corify Care S.L has taken, and is continuing to take, to ensure that modern slavery and human trafficking are not taking place within our business or supply chain.

Corify Care S.L is a Spanish-based medical technology company developing and commercialising digital health solutions for the diagnosis and treatment of cardiac arrhythmias. Our technology is used in clinical settings across Europe and the United Kingdom. We employ 24 full-time equivalent staff across office-based and remote working arrangements, with field-based clinical support personnel supporting procedures at hospital sites.

## 2. 2. Our Commitment

Corify Care S.L is committed to preventing modern slavery and human trafficking in all our corporate activities and ensuring that our supply chains are free from such practices. We operate a zero-tolerance approach to modern slavery and are dedicated to acting ethically and with integrity in all our business relationships and dealings.

As a company headquartered in Spain and operating within the European Union, Corify Care S.L is subject to Spanish labour law, EU employment directives, and — in respect of our NHS contracting activity — the requirements of the Modern Slavery Act 2015. We fully embrace these obligations and are committed to continuous improvement in our approach to identifying and addressing risk.

## 3. 3. Our Policies

To support our commitment to preventing modern slavery, Corify Care S.L has implemented the following policies:

### 3.1. 3.1 HR Policy

Our HR Policy sets out the standards Corify Care S.L upholds in relation to recruitment, employment conditions, and employee welfare. It includes provisions to ensure that all staff are employed voluntarily, receive fair remuneration in line with applicable legislation, and have the right to work in their country of employment. Our onboarding process includes right-to-work verification for all new employees and contractors. The HR Policy is reviewed annually and applies to all staff regardless of location or employment type.

### **3.2. 3.2 Supplier Code of Conduct**

Our Supplier Code of Conduct sets out the ethical, legal, and social standards we expect all suppliers and business partners to meet as a condition of working with Corify Care S.L. This includes an explicit requirement that suppliers comply with all applicable laws prohibiting modern slavery, forced labour, child labour, and human trafficking. Suppliers are required to cascade equivalent standards through their own supply chains where relevant.

### **3.3. 3.3 Whistleblowing Policy**

Corify Care S.L maintains a confidential whistleblowing mechanism that enables employees, contractors, and other stakeholders to raise concerns about modern slavery, human trafficking, or any other unethical conduct without fear of retaliation. Reports may be made directly to the CEO or, where the concern relates to senior management, to a designated non-executive contact. All reports are treated with confidentiality and investigated promptly.

## **4. 4. Due Diligence Processes**

Corify Care S.L conducts due diligence on all new suppliers prior to engagement and reviews existing suppliers on a regular basis. Our due diligence process includes the following steps:

### **4.1. 4.1 Supplier Screening**

All prospective suppliers are screened against our Supplier Code of Conduct prior to contract award. Suppliers are required to confirm, in writing, their compliance with modern slavery legislation and their commitment to maintaining equivalent standards within their own supply chains. Where a supplier is unable to provide satisfactory assurances, Corify Care S.L will not proceed with engagement.

### **4.2. 4.2 Risk-Based Reviews**

Existing suppliers are reviewed periodically, with higher-risk relationships subject to more frequent review. Risk is assessed based on the factors set out in Section 5 below. Where a review identifies concerns, Corify Care S.L will engage with the supplier to understand and remediate the issue, or terminate the relationship if satisfactory remediation cannot be achieved.

### **4.3. 4.3 Employee Recruitment and Verification**

All employees and contractors undergo right-to-work verification as part of our standard onboarding process. Corify Care S.L does not use recruitment agencies that charge fees to workers, and all employment arrangements are documented in written contracts compliant with applicable national law.

## 5. 5. Risk Assessment and Management

Corify Care S.L recognises the importance of identifying and managing the risks of modern slavery within our operations and supply chain. We have assessed our overall risk as low-medium, based on the following analysis:

### 5.1. 5.1 Geographical Risk

Corify Care S.L is headquartered in Madrid, Spain, and operates primarily within the European Union and United Kingdom — jurisdictions with strong statutory frameworks for the prevention of forced labour, human trafficking, and modern slavery. Our direct workforce is employed within these regions and is subject to the full protections of EU and UK employment law. This materially limits our direct operational risk.

### 5.2. 5.2 Sector Risk

As a digital healthcare technology company, Corify Care's primary activities involve highly skilled clinical, engineering, and commercial personnel. Roles of this nature are significantly less susceptible to modern slavery than sectors characterised by low-skilled, manual, or seasonal labour. Our workforce is well-qualified, directly employed or contracted, and supported by formal HR policies.

### 5.3. 5.3 Supply Chain Risk

Corify Care's supply chain includes providers of software development services, cloud infrastructure, professional services, and a smaller number of suppliers involved in the manufacture or assembly of hardware and medical device components. We recognise that the hardware and medical device component supply chain carries a moderately higher inherent risk than our software-facing relationships, due to the potential for extended supply chains and varied manufacturing environments. We address this through the supplier due diligence measures described in Section 4 and the Supplier Code of Conduct referenced in Section 3.2.

### 5.4. 5.4 Risk Management Measures

In addition to the due diligence processes described in Section 4, Corify Care S.L manages modern slavery risk through the following measures:

**Supplier contractual obligations:** All material supplier contracts include a requirement to comply with applicable modern slavery legislation and to maintain equivalent obligations through their own supply chains.

**Employee training:** All employees receive awareness training as part of onboarding, covering recognition of modern slavery and human trafficking, and the reporting mechanisms available to them.

**Continuous improvement:** We are committed to reviewing and strengthening our risk management processes annually, incorporating any changes in legislation, NHS procurement guidance, or best practice.

## 6. 6. Training and Awareness

Corify Care S.L provides training to all employees to ensure they understand the risks of modern slavery and human trafficking and are aware of our policies and the reporting mechanisms available to them. Training is delivered at induction for all new starters and refreshed on an annual basis. Training content covers:

**Recognition:** Identifying indicators of modern slavery and human trafficking in the workplace and supply chain.

**Reporting:** Understanding the whistleblowing process and how to raise concerns confidentially and without fear of retaliation.

**Policy awareness:** Familiarity with Corify Care’s HR Policy, Supplier Code of Conduct, and this Modern Slavery and Human Trafficking Statement.

## 7. 7. Monitoring and Reporting

Corify Care S.L monitors the effectiveness of its modern slavery controls through the following mechanisms:

**Annual policy review:** This statement, the HR Policy, and the Supplier Code of Conduct are reviewed and updated by the CEO on an annual basis, or sooner in response to material changes in legislation or business operations.

**Supplier review cycle:** Supplier compliance with the Supplier Code of Conduct is reviewed on a risk-proportionate basis, with higher-risk suppliers subject to more frequent assessment.

**Incident tracking:** Any concerns raised through the whistleblowing mechanism or identified through supplier reviews are logged, investigated, and reported to the CEO. Where concerns relate to the CEO, they are escalated to a designated contact within the company’s governing body.

The findings of our monitoring activity, and any actions taken, are reviewed by senior management. This statement will be updated and re-published annually to reflect progress and any changes in our approach.

## 8. 8. Approval and Sign Off

This statement has been approved by the CEO of Corify Care S.L and will be reviewed and updated annually. It is published in accordance with Section 54 of the Modern Slavery Act 2015.

Signed on behalf of Corify Care S.L:

**Andreu M. Climent**

CEO, Corify Care S.L

March 2026

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