

Modern Slavery Act Statement

ARKA Europe, S.A.

Financial Year ending 31 December 2025

1. Introduction

This statement is made pursuant to Section 54 of the *UK Modern Slavery Act 2015* and sets out the steps taken by **ARKA Europe, S.A.** to prevent modern slavery and human trafficking in its business operations and supply chain.

ARKA Europe, S.A. is committed to ensuring that slavery, forced labour, servitude, debt bondage, child labour, or human trafficking have no place in our organization or business relationships.

2. Our Business

ARKA Europe, S.A. is an innovative European company dedicated to the development, production, and commercialization of high-quality single-use medical devices. With an investment of €45 million, ARKA Europe established the **first examination glove manufacturing facility in Europe**, located in Vila Nova de Famalicão, Portugal. Unlike many global competitors who rely on offshore manufacturing, ARKA produces in Europe under some of the most robust labour, health, and safety frameworks in the world.

3. Our Supply Chain

Our supply chain is **short, transparent, and primarily European-based**, significantly reducing exposure to regions with higher risks of modern slavery. All suppliers and contractors must comply with applicable European labour legislation and international standards, including the conventions of the **International Labour Organization (ILO)**.

4. Our Policies & Commitments

We have adopted policies and governance instruments to safeguard against modern slavery and forced labour, including:

- **Code of Ethics and Conduct**, applicable to employees, contractors, and service providers.
- **Whistleblowing & Reporting Channels**, available internally and externally, in line with the EU Whistleblowing Directive.
- **Human Resources Policies** ensuring equal treatment, fair recruitment, and safe working conditions.
- **Zero Tolerance Policy**: we will not engage with or support any supplier involved in slavery or human trafficking.

Our compliance is explicitly aligned with the **11 ILO Forced Labour Indicators**, ensuring protection against:

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. Degrading working and living conditions
11. Excessive overtime

5. **Due Diligence & Risk Assessment**

In 2025, ARKA underwent an **independent Social Audit** (Foster Consulting) covering the 11 ILO indicators.

Key findings:

- **No evidence** of forced labour practices was identified.
- Workers confirmed compliance during private interviews.
- Recommendations for improvement were made (e.g., training on ethics and harassment prevention, inclusion of psychosocial risks in OSH assessments, reinforced monitoring of temporary work agencies).
- These actions are being implemented in 2025–2026.

6. Training & Awareness

- All staff receive induction training covering labour rights, workplace safety, and ethical conduct.
- Managers and supervisors undergo training on recognizing and addressing risks of exploitation.
- Suppliers are required to confirm their adherence to the ILO principles and European labour laws.

7. Governance & Responsibility

The **Board of Directors and Senior Management** hold ultimate responsibility for this statement and its implementation.

- The HR and Compliance functions oversee day-to-day monitoring.
- Adequate resources are allocated to enforce compliance and ensure ongoing vigilance.
- A dedicated **whistleblowing mechanism** ensures workers and stakeholders can raise concerns confidentially, without fear of retaliation.

8. Monitoring Effectiveness

Effectiveness is assessed through:

- Internal and external audits
- Worker engagement and consultation
- Monitoring of suppliers and contractors
- Review of any reports received through whistleblowing channels

9. Review & Transparency

This statement is **reviewed annually** to reflect changes in legislation, operations, or supply chain. It will be published on the **ARKA Europe website** and is available to stakeholders upon request.



Pedro Menezes, ARKA Medical's CCO



ARKA
protecting life

Administration

Vitor Teixeira, ARKA Medical's CCO