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MODERN SLAVERY AND HUMAN TRAFFICKING POLICY AND ANNUAL STATEMENT 2026

1. Purpose, basis and scope

Smart Soft Healthcare JSC conducts its business ethically, responsibly and with respect for fundamental human rights. This Policy and Annual Statement sets out the Company's approach to identifying, preventing and mitigating the risk of modern slavery, human trafficking, forced labour and child labour in its business and supply chains. It has been prepared with reference to section 54 of the UK Modern Slavery Act 2015 and UK Government Transparency in Supply Chains guidance, including for NHS-related due diligence requirements.

2. Organisation, business and supply chains

Smart Soft Healthcare JSC is an AI medical software company with its registered office at 113 Gen. Kolev Str., office 7.2, 9002 Varna, Bulgaria. The Company has 19 employees and operates a certified Quality Management System under ISO 13485. Its activities are office-based and relate to software development, quality management, regulatory compliance, clinical validation, business development, administration, and deployment of AI Software as a Medical Device (AI SaMD). The Company does not operate manufacturing facilities or engage in physical production.

The Company's supply chain mainly consists of established technology and software providers, cloud and office service providers, professional advisers, regulatory consultants, medical/radiology consultants, accounting and legal service providers, and courier/logistics providers. Suppliers and business partners are primarily located in the European Union, the United Kingdom and the United States, with additional suppliers engaged where justified by business requirements. Additional information may be requested where supplier risk is higher or material.

3. Policy commitments

Smart Soft Healthcare JSC has a zero-tolerance approach to slavery, servitude, human trafficking, forced or compulsory labour, exploitation and child labour. The Company prohibits child labour, withholding of wages or identity documents as a means of control, coercion, intimidation, harassment, exploitation of workers, compulsory overtime and knowingly working with suppliers or partners involved in such practices. The Company does not require workers to pay recruitment fees, does not restrict freedom of movement and engages employees under documented employment arrangements which comply with applicable employment legislation. The Company does not support and does not use unpaid student labour or child labour.
Oversight of this Policy and Annual Statement rests with the CEO and Regulatory Manager. The Company's approach is supported by internal controls covering workplace conduct, HR, recruitment, anti-fraud and anti-corruption, legal and regulatory compliance, purchasing, supplier evaluation, information security and ISO 13485 quality management.

4. Due diligence and supplier management

Smart Soft Healthcare JSC applies a proportionate and risk-based approach to supplier due diligence. The Company normally works with established suppliers, professional service providers and approved or previously assessed vendors. Supplier assessment may include business purpose, quality and regulatory relevance, service capability, price and payment terms, professionalism, change control, environmental and social responsibility, data protection,

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contractual arrangements, risk level and re-evaluation. New suppliers should be justified based on business need, suitability and comparison of offers where practicable.

Where appropriate, suppliers may also be requested to confirm compliance with applicable labour, employment and human rights legislation through contractual commitments or supplier questionnaires.

The Company considers the risk of modern slavery and human trafficking within its direct operations to be low, based on its small employee base, professional office-based work, documented employment arrangements, absence of manufacturing facilities and absence of manual labour-intensive production. The supply chain areas where potential risks could arise are indirect and mainly relate to IT hardware, cloud infrastructure, logistics, event and travel-related providers, outsourced professional services, clinical research and consultancy arrangements and suppliers' own subcontractors outside the Company's direct control. Higher-risk suppliers may be subject to additional checks, information requests, contractual commitments or supplier decisions.

Smart Soft Healthcare expects suppliers and business partners to uphold standards consistent with internationally recognised human rights principles and applicable labour legislation.

5. Training, awareness and reporting concerns

During 2026, the Company will provide targeted awareness to relevant employees involved in HR, office management, finance, purchasing, supplier selection, supplier management and regulatory/customer due diligence. Awareness will cover modern slavery, human trafficking, forced labour and child labour; warning signs; zero tolerance; supplier risk areas; and reporting routes.

Employees must report any concern or suspicion relating to modern slavery, human trafficking, forced labour, child labour, worker exploitation or unethical labour practices to their line manager or another appropriate member of management. The Company will review concerns raised in good faith and take appropriate action. Employees will not be penalised for raising genuine concerns in good faith, even if not substantiated. If concerns relate to a supplier or business partner, the Company may request information, seek corrective actions, monitor, suspend cooperation, terminate the relationship or notify competent authorities where required, while seeking to avoid increased harm to affected individuals.

For 2026, the Company will monitor performance indicators, including reported concerns, supplier reviews completed, higher-risk suppliers assessed, targeted awareness activities delivered and annual policy review. During the relevant reporting period, no substantiated concerns relating to modern slavery, human trafficking, forced labour or child labour have been identified. This Policy and Annual Statement will be reviewed at least annually as part of the Company's ISO 13485 Management Review and Quality Management System governance processes, or earlier where material changes occur. It is approved by the Chief Executive Officer.

Prepared by:	Approved by:
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