

## Modern Slavery Statement - Liberator

This Modern Slavery Statement is made in accordance with section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Liberator Ltd (referred to in this statement as *the Company*) to prevent modern slavery and human trafficking in its business operations and supply chains. This statement relates to the financial year ending 31<sup>st</sup> October 2026

### **Our Organisation and Structure**

Liberator Ltd is a UK-based business engaged in the sale and distribution of communications aids and related assistive technology. These products are designed to support individuals with communication difficulties, including people with disabilities, neurological conditions, or other additional needs.

The Company operates primarily from the United Kingdom, with a central management structure overseeing sales, operations, customer support, and supplier relationships. Strategic oversight is provided by senior management, who retain responsibility for ethical governance, compliance, and risk management.

### **Our Business Activities**

Our core activity is the sourcing, sale, and support of communications aids, which may include electronic devices, software-enabled solutions, and associated accessories. These products are supplied to healthcare providers, educational organisations, charities, and end users.

While our direct operations are non-manufacturing, our supply chain may include third-party manufacturers, distributors, logistics providers, and technology partners, some of whom operate outside the United Kingdom.

### **Our Commitment**

Liberator Ltd is committed to acting ethically and with integrity in all business relationships. We recognise our responsibility to take a robust approach to modern slavery and human trafficking and are committed to preventing these practices in our operations and supply chains.

We have a zero-tolerance approach to modern slavery and expect the same high standards from all our suppliers, contractors, and business partners.

### **Definitions**

Modern slavery encompasses:

- Human trafficking
- Forced or compulsory labour
- Servitude and bonded labour
- Practices that deprive individuals of their freedom for exploitation

## **Supply Chains**

Our supply chains primarily relate to:

- Communications aid devices and hardware
- Software and digital solutions
- Ancillary components and accessories
- Logistics, warehousing, and distribution services

A significant proportion of the Company's core assistive technology products are sourced from its parent organisation, PRC-Salttillo. PRC-Salttillo is an established manufacturer and developer of assistive technology solutions operating internationally within the healthcare sector.

PRC-Salttillo does not publish a separate modern slavery statement, and Liberator Ltd does not currently conduct routine independent audits of its parent organization's manufacturing operations. The Company acknowledges this and recognises that its ability to directly influence upstream manufacturing practices within its parent organisation is limited. Liberator Ltd therefore focuses its modern slavery efforts on areas within its control and applies a proportionate, risk-based approach to supplier selection and relationship management, prioritising established and long-standing suppliers and implementing contractual assurances.

## **Risk Assessment and Potential Exposure**

The Company considers its overall exposure to modern slavery risk to be low to moderate, due to:

- the non-labour-intensive nature of our direct operations;
- our focus on established, reputable suppliers; and
- limited reliance on temporary or agency labour.

However, we acknowledge that risks may arise further down the supply chain, particularly where goods are manufactured overseas.

Potential exposure may arise within the manufacture of electronic components and devices, and within international logistics and distribution services where goods are sourced or transported overseas.

The Company's primary exposure to manufacturing-related modern slavery risk arises through its parent organisation, PRC-Salttillo, and a small number of other established suppliers and logistics partners.

The Company undertakes a proportionate assessment of modern slavery risk across its supply chains, taking into account sector, geography, and nature of activity. Where elevated risk is identified, additional due diligence may be undertaken, and concerns are escalated internally for review.

## **Due Diligence and Steps Taken**

To mitigate the risk of modern slavery, Liberator Ltd has implemented the following measures:

- conducting risk-based due diligence on new suppliers;
- requiring suppliers to confirm compliance with applicable labour laws and human rights standards;
- including ethical and modern slavery expectations within supplier agreements where appropriate;
- reviewing supplier relationships on an ongoing basis; and
- maintaining internal reporting and grievance mechanisms for staff.

Where concerns are identified, we reserve the right to suspend or terminate supplier relationships.

As part of supplier onboarding, Liberator Ltd requires completion of a formal supplier due diligence questionnaire. This includes supplier confirmation of compliance with the Modern Slavery Act 2015, warranties regarding labour practices within their own operations and supply chains, and acceptance, where contractually agreed, of the Company's right to request additional information or conduct proportionate audits where concerns are identified.

## **Policies**

The Company's commitment to preventing modern slavery is supported by relevant internal policies, including:

- **Safeguarding Policy** - We are committed to safeguarding children, young people and vulnerable adults from abuse. We acknowledge our responsibility to protect their welfare, recognising that individuals with disabilities or from minoritized communities have the right to equal protection.
- **Code of Conduct** – We set out expected standards of behaviour of all staff and any individual representing Liberator and aims to reduce the likelihood of misplaced or malicious allegations. While adhering to international human rights, safeguarding standards, and local laws is essential, this code will prevail when it sets a higher standard.
- **Recruitment Policy** – Our policy affirms that all applicants are assessed objectively on their merits in accordance with the UK Equality Act 2010.
- **Supplier expectations and contractual standards** – covering GDPR, Equality, Modern Slavery, etc

This commitment is embedded within the Company's ISO 9001 quality management system, which establishes senior management accountability, measurable objectives, and annual management review of policies and procedures to ensure continued compliance with legal, regulatory, and ethical requirements.

### **Training and Awareness**

Staff involved in procurement, supplier management, and operations are made aware of modern slavery risks relevant to their roles.

Modern slavery awareness is embedded within induction processes and ongoing management oversight. Staff with responsibility for procurement, supplier management, or operational decision-making receive role-appropriate awareness to enable them to identify and escalate potential concerns.

### **Effectiveness and Review**

Liberator Ltd will continue to monitor the effectiveness of the steps taken to prevent modern slavery and will review this statement annually.

The effectiveness of the Company's approach is monitored through proportionate assurance activities, including supplier confirmations, periodic review of supplier relationships, and internal reporting mechanisms.

To date, no instances of modern slavery or human trafficking have been identified through the Company's proportionate due diligence and internal reporting mechanisms. Oversight of these measures sits with senior management.

## Approval

This statement has been approved by the senior management of Liberator Ltd.

**Signed:** 

**Name:** Robin Short

**Position:** Managing Director

**Date:** 30/03/2026