Modern Slavery Statement

Statement for the period 1 January 2025 to 31 December 2025
This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for Moonlight Topco Limited, the parent company of Medica Group Limited and its subsidiaries.

Introduction

This statement covers the period from 1 January 2025 to 31 December 2025 and sets out the steps we took during 2025 and H1 2026 to strengthen our policies, governance and due diligence processes. It provides a comprehensive overview of the actions taken across the reporting year to help prevent modern slavery and human trafficking in our operations and supply chains, including our submission to the UK Government's Modern Slavery Assessment Tool (MSAT) in October 2025.

About Medica

Medica Group operates through its subsidiaries:

- Medica Reporting Ltd (UK) – UK market leader in teleradiology and a leading provider of pathology services.
- Global Diagnostics Ireland Ltd (trading as Medical Ireland) – Ireland market leader in teleradiology and a leading provider of patient-facing diagnostic imaging services.
- RadMD LLC – US based provider of complex imaging services for clinical trials.
- JCA Medical Seminars Ltd (trading as Educate by Medica) – international provider of radiology education and continuous professional development courses.
- Medica IT Services Ltd (UK) – supporting Medica Group's IT infrastructure.

The Group's ultimate parent company, Moonlight Topco Limited is incorporated and registered in the UK. For the purposes of the UK Modern Slavery Act 2015, this statement is made on behalf of Moonlight Topco Limited and its subsidiaries, together referred to as "Medica".

Our Commitment

We are committed to operating ethically and sustainably and respecting human rights in all aspects of our business. We recognise all internationally recognised human rights principles, including the *Universal Declaration of Human Rights* and the *International Labour Organisation's Declaration on Fundamental Principles and Rights at Work*. We take our responsibility to respect human rights seriously and are committed to ensuring people are treated with dignity and respect throughout our operations and supply chains. In line with the *UN Guiding Principles on Business and Human Rights*, we are strengthening measures to identify, prevent and eradicate exploitation in all its forms.

Key Actions in 2025

During 2025, we took significant steps to strengthen our approach to tackling modern slavery and human trafficking. These actions included:

- **Policy** – developed a Human Rights Policy aligned with the UN Guiding Principles and introduced a Supplier Code of Conduct aligned with International Labour Organization (ILO) standards.

- **Benchmarking** – as part of a wider strategic review of ESG, engaged a specialist external consultancy to help us assess and benchmark our human rights practices.
- **Risk assessment** – completed a group-wide mapping exercise of Tier 1 suppliers across multiple geographies and identified higher-risk sourcing countries.
- **Due diligence** – developed an enhanced supplier onboarding process and began securing acknowledgement of our Human Rights Policy and Supplier Code of Conduct from priority suppliers.
- **Governance, monitoring and review** – established a C-suite-led ESG Steering Group to oversee ESG progress, including modern slavery, and benchmarked our progress using the UK Government's Modern Slavery Assessment Tool.
- **Training** – delivered modern slavery awareness training to 99% of UK employees.

Our People

As of December 2025, Medica employs 493 people in the UK, Ireland and the United States in a range of operational, clinical, leadership and support roles. We are committed to providing a safe, fair and respectful working environment, and our employment practices are designed to uphold international labour standards.

Key elements of our approach include:

- **Fair pay** – in the UK, we are an accredited *Living Wage Employer* with the Living Wage Foundation, ensuring that all employees are paid at least the Real Living Wage.
- **Wellbeing and support** – we provide all employees with access to wellbeing initiatives, including mental health resources and an Employee Assistance Programme. We invest in technology, including AI, to automate routine tasks and reduce repetitive workload.
- **Employee voice** – we conduct annual employee engagement surveys and provide staff with ongoing opportunities to share feedback through an online platform.
- **Equality, Diversity and Inclusion (EDI)** – we have an active EDI group to ensure all voices are heard and acted upon.
- **Recruitment** – we recruit all employees directly or through reputable agencies, with strict compliance checks to ensure no illegal deductions or exploitative practices.

Supply Chain and Due Diligence

Medica operates across the UK, Ireland and the United States, working with a wide range of suppliers to deliver specialist healthcare and clinical trial services. While our initial assessment indicates that our Tier 1 supply chain is generally low risk, we recognise that certain industries and geographies carry higher risks, particularly further down the supply chain. We have identified medical consumables, facilities services, outsourced services, construction and building repairs, hotels, accommodation and events as priority areas for further assessment.

Initial supply chain mapping and risk assessment

In 2025, we completed a group-wide supply chain mapping exercise. This identified supplier relationships across the UK, Ireland and the US, as well as in other countries including China, Germany, India, Japan, Malaysia, Sweden, the UAE, Indonesia and Australia.

Fig 1: Map indicating the countries where Medica has operations and mapped Tier 1 critical suppliers

We carried out a geographical assessment of modern slavery prevalence using a global risk rating system. This produced the following results:

	Industry(s)		Location(s)											
	Health Care Delivery	Software & IT Services	Australia	China	Germany	India	Indonesia	Ireland	Japan	Malaysia	Sweden	United Arab Emirates	United Kingdom	United States of America
Labour practices [1]	N/A	N/A	4.98	8.30	1.66	8.30	8.30	1.66	3.32	8.30	1.66	8.30	6.64	6.64
Modern slavery prevalence [2]	N/A	N/A	0.40	2.43	0.10	5.81	4.71	0.19	0.10	4.33	0.17	10.00	0.57	1.83

Fig 2. – Geographical modern slavery and labour practices risk rating by sourcing country (*Source: Landmark Risk Horizon*).

Our assessment indicated that our core operations in the UK, Ireland and the US carry a low risk of modern slavery, but some areas of our supply chain, including medical consumables and hotels in the UAE, are associated with higher-risk regions.

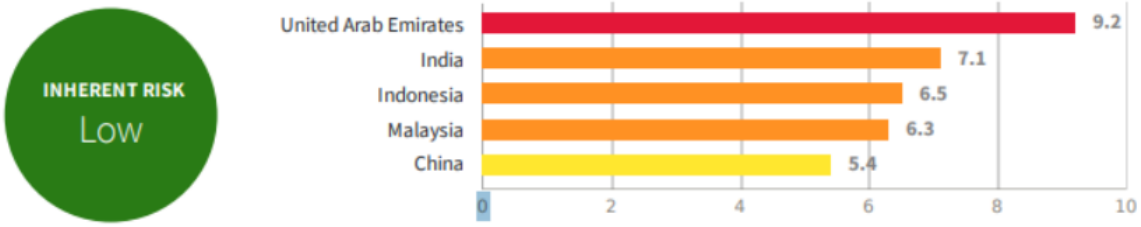

Fig 3: Overall risk rating and top 5 high risk supplier regions for labour practices and modern slavery prevalence (*Source: Landmark Risk Horizon*).

Our analysis suggests that our highest modern slavery risk arises from the procurement of medical consumables for operations in Ireland, where we operate patient-facing clinics. These consumable items are supplied by Ireland-based distributors, but the products originate from global industries such as textiles and disposables, where modern slavery and labour rights risks are recognised as high. As a result of our review, we are prioritising these suppliers for further due diligence and plan to undertake detailed Tier 2 mapping over the next 12 months.

This risk from consumables and textiles does not extend to Medica's UK client services, which are delivered through teleradiology and telepathology. Our UK risk exposure is mainly in technology, IT infrastructure, facilities and professional services. While we consider our UK supply chain to be relatively low risk, we recognise the importance of going beyond Tier 1 suppliers to address modern slavery risks fully. Over the next 12 months, we will undertake Tier 2 and upstream due diligence to build a clearer picture of product origin and labour practices.

Our structured approach

To manage risks consistently across the Group, we apply a three-stage process:

1. **Initial assessment** – recording and categorising suppliers, completing financial, patient care and data production checks, and confirming compliance of UK suppliers who are required to publish modern slavery statements.

2. **Risk prioritisation** – assigning Red-Amber-Green (RAG) ratings to suppliers, and identifying higher-risk categories such as consumables, facilities services, outsourced support, and certain IT providers.
3. **Due diligence** – requiring acknowledgement of our Human Rights Policy and Supplier Code of Conduct, sending questionnaires to higher-risk suppliers and following up any concerns identified.

Supply chain improvement actions in 2025

In addition to publishing our Human Rights Policy and Supplier Code of Conduct, during 2025 we issued these documents to priority suppliers for acknowledgement and updated supplier record systems to track risk ratings and due diligence progress. We established a framework and systems to support detailed supplier due diligence and commenced implementation actions, including issuing questionnaires to all red-rated suppliers. Responses received during the reporting period were reviewed and any required corrective actions were identified for follow-up. Findings from this process will continue to inform our next annual statement. Supply chain targets are set out below in our *Targets and Future Plans* section.

Our Policies

Our policies set clear expectations for employees, suppliers, and partners regarding modern slavery and human rights. These policies are reviewed annually to ensure alignment with international standards and best practice.

In 2025, we strengthened our policy framework by establishing:

- **A Supplier Code of Conduct** – this code sets clear requirements on labour rights, working conditions and ethical business conduct. It is aligned with the *International Labour Organization (ILO) Core Conventions* and the *Ethical Trading Initiative (ETI) Base Code*.
- **A Human Rights Policy** – this policy sets out Medica's commitment to respect and protect human rights across its operations and supply chains. It is aligned with the *Universal Declaration of Human Rights*, the *ILO Declaration on Fundamental Principles and Rights at Work* and the *UN Guiding Principles on Business and Human Rights*.
- **An Extended Supplier Due Diligence Procedure** – this procedure strengthens the onboarding, monitoring and risk assessment of suppliers by increasing the focus on identifying and mitigating modern slavery risks.

We publish these policies on our website, distribute them to all employees and suppliers and embed them in our procurement and contract management processes.

Training and Awareness

We believe that raising awareness and building knowledge across our workforce are essential to ensuring that modern slavery risks are identified and addressed.

During 2025, we continued to build awareness of modern slavery risks across the business. Our modern slavery course remained mandatory for all departments and job levels and included a seven-minute awareness video from the UK *Gangmasters and Labour Abuse Authority (GLAA)*, together with an introduction to the Medica Modern Slavery Policy. Completion of the course reached 99% during the reporting period.
In 2025, we also developed role-appropriate training for:

- **Procurement and contract managers** – identifying and addressing modern slavery risks in supplier relationships, due diligence and contract management.

- **General employees** – raising awareness of modern slavery and the signs to look for and explaining how to escalate concerns through internal reporting channels.
- **Board and senior leadership** – reinforcing accountability at the highest level, with emphasis on governance responsibilities and oversight.

During 2025, we also developed training for contracted reporters, including teleradiology and pathology service suppliers, to ensure they are aware of Medica's Human Rights Policy and Supplier Code of Conduct, understand their ethical responsibilities and know how to report concerns. These programmes were designed and prepared for rollout using the *MyCompliance* platform, which will be used to track completion. We also developed materials for suppliers to ensure they are aware of Medica's standards and to support them in strengthening their practices.

Whistleblowing, Feedback and Wellbeing

We recognise that providing safe and accessible channels for raising concerns is central to ensuring modern slavery risks are identified and addressed. We encourage employees, suppliers and external stakeholders to speak up if they witness or suspect any unethical behaviour, including potential modern slavery or human rights abuses. We have established a clear procedure and service level agreement for responding to internal or external reports of suspected modern slavery.

Employees can raise concerns confidentially with HR or via: whistleblowing@medica.co.uk

We also carry out regular anonymous employee surveys and hold Town Hall meetings where employees can ask questions anonymously.

These mechanisms provide structured channels for feedback, helping management identify issues early and respond effectively.

We provide contracted reporters with dedicated channels for feedback and concern-raising through *Ask Nicely* and *Microsoft Forms*. We promote reporter wellbeing through:

- **Flexible working hours** – allowing teleradiologists to balance Medica reporting with NHS and other personal commitments.
- **Access to a dedicated account manager** – ensuring support and a clear point of contact.
- **Technology solutions** – reducing repetitive workload and improving efficiency.
- **Professional development (CPD) – supporting development** at no cost via Medica's in-house training facility.

Training and compliance systems include a comprehensive induction that all staff complete via the *MyCompliance* platform. This platform, which is also used to deliver ongoing compliance training and updates, provides a central record of completion that allows us to ensure awareness of policies. Contracted reporters are provided with Medica's policies via a central information hub.

External grievances, concerns and complaints can be raised by patients, medical staff, suppliers and other stakeholders through Medica's external feedback and complaints process. This is available on our website: medica.co.uk/feedback-complaints.

All reports are reviewed promptly, confidentially and sensitively. Where appropriate, they are escalated to the Group Head of HR. The most serious matters, including potential modern slavery concerns, are reported to the Medica Group Board and reviewed by the ESG Steering Group.

Governance, Monitoring and Improvement

We are committed to measuring the effectiveness of our actions and to continuous improvement. We track our progress using the UK Government's Modern Slavery Assessment Tool (MSAT) and maintain governance and oversight at senior management and Board level.

The Group Head of HR is responsible for human rights, including modern slavery, and reports directly to the Board on these matters. This ensures that modern slavery is treated as a core people and compliance issue at the most senior level. Progress is reported to the Board at least twice a year, with additional updates provided when significant milestones are reached, such as the completion of supplier mapping or policy changes.

Following a review of how best to embed modern slavery and wider environmental and social issues into leadership decision-making, the Board agreed in 2025 to establish a new ESG Steering Group chaired by the Group Head of HR. This group oversees environmental, social and governance progress across the Medica Group, including the monitoring of modern slavery and related KPIs. It includes senior representation from our UK, Ireland and US operations to ensure that oversight reflects the full scope of our business and supply chains.

If cases of modern slavery are identified in our operations or supply chains, we will take immediate steps to protect and support the individuals affected, as set out in our Modern Slavery Reporting and Response Procedure. In line with the UN Guiding Principles on Business and Human Rights, our priority will be to work with the supplier or partner to remediate the situation and prevent recurrence. If a supplier fails to engage or improve, we would use our leverage to escalate matters. If necessary, and as a last resort, we would terminate the relationship. Throughout this process, remediation and victim support would be prioritised over commercial considerations.

In 2025, we engaged a third-party consultancy to review our Environmental, Social and Governance (ESG) materials and provide feedback to our Board. The consultancy also carried out an assessment of our modern slavery practices. The findings and recommendations from this review have been implemented to strengthen our risk assessment, supply chain due diligence and policies.

These steps provide assurance to our Board that our approach is credible, benchmarked against best practice and aligned with regulatory expectations. Throughout 2025, our focus was on mapping risks, strengthening policies and building governance structures. Although our work on supplier due diligence and remediation remains at an early stage, we have established clear KPIs and timelines to support continued progress.

Targets and KPIs for 2026

To ensure our approach is measurable and transparent, we have established key performance indicators (KPIs) for 2026, as set out in the table below. These will enable us to track progress, assess effectiveness and report consistently in future statements. The Progress column shows our position as at the first quarter of 2026; these figures are interim and a number of activities continue through the remainder of the year.

Topic	KPI	Target 2026	Progress (Q1 2026)	Measurement Method
Supplier policies	Red-rated suppliers receiving Human Rights	100% issued by end Jan 2026 and 75%	Policy and Code issued to 100% of red-rated suppliers	Supplier management system records

	Policy and Supplier Code of Conduct	acknowledged by end March 2026	(target met). Acknowledgements at 42% against the 75% target – issuance is complete, with acknowledgement supplier-dependent and actively being followed up.	
Due diligence	Red-rated suppliers completing further due diligence questionnaires New suppliers completing due diligence questionnaire before onboarding	100% issued by end Jan 2026 and 75% completed by end March 2026 100% of new suppliers in higher risk categories	Questionnaires issued to 100% of red-rated suppliers (target met) and 100% of new higher-risk suppliers screened before onboarding (target met). Completion at 28% against the 75% target, as completion is supplier-led and continues to be chased.	Questionnaire responses logged
Due diligence	Supplier questionnaires reviewed and actioned (e.g. adjust risk rating, make further enquiries, extend due diligence)	100% of responses reviewed and actioned by end April 2026	100% reviewed and actioned to date. Review depends on completed questionnaires being returned and progresses as responses arrive.	Supplier management records
Due diligence	Red-rated Tier 1 suppliers providing country locations for Tier 2 suppliers (their Tier 1 suppliers)	Returns completed by 50% of applicable suppliers by end April 2026	9% of returns received to date against the 50% target. This is early-stage activity, with follow-up underway across outstanding suppliers.	Supplier management records
Training and awareness: Procurement	Role-specific training developed for Medica procurement and contract managers, and all managers to complete this training	Training developed by end Jan 2026	Training developed and rolled out; 100% completion achieved (target met).	Training records

		100% completed by end March 2026		
Training and awareness – New Starters	New employees completing modern slavery training as part of induction	100%	100% of new employees completed modern slavery training at induction (target met).	Training records
Training and awareness – General employees	Employees receiving annual refresher training on modern slavery	100% by end 2026	On track; due by end 2026, with completion to be reported in our next statement.	Training records
Training and awareness – Board and leadership	Board and senior leadership (executive committee) completing training	100% by end March 2026	100% completed (target met).	Training records
Training and awareness – Suppliers	Contracted reporters receiving modern slavery briefing through Medica systems	Contracted reporters receiving modern slavery briefing through Medica systems	Briefing developed and prepared for release via our learning platform; deployment has been rescheduled to H2 2026 and is now underway.	Reporter communications records
Training and awareness – Suppliers (Tier 1 SMEs)	Red-rated Tier 1 SMEs provided with Medica Modern Slavery Guidance sheet explaining our policy and raising awareness of modern slavery risks	100% by end March 2026	100% Guidance sheet developed; issuance to red-rated Tier 1 SMEs (target met).	Supplier records
Governance and oversight	Quarterly ESG Steering Group meetings held (with supplier human rights and modern slavery as a standing agenda)	100% in 2026	Quarterly meeting cadence established for 2026, with modern slavery as a standing agenda item; on track.	Meeting agendas and minutes
Governance and oversight	Annual benchmarking and assessment of progress using UK	Submitted by end October 2026	On schedule for submission by end October 2026.	Feedback from MSAT tool and feedback from clients on our MSAT report

	Government MSAT tool			
Remediation	Modern slavery cases where Medica has engaged with suppliers to remediate and support affected individuals in line with UN Guiding Principles on Business and Human Rights	100%	No modern slavery cases were identified during the period. Response and remediation procedures remain in place should any arise.	Case records

We will review and update our KPIs at least annually to ensure they remain relevant, stretching and aligned with both regulatory expectations and our commitment to continuous improvement. To ensure accountability at the most senior levels of the Medica Group, the ESG Steering Group will review KPI performance quarterly and report its findings to the Board.
We recognise that tackling modern slavery is an ongoing responsibility. We remain committed to protecting people by continuously improving our policies and processes to help ensure our supply chains are free from modern slavery and other human rights abuses. This statement was approved by the Board of Directors of Medica Group on behalf of Moonlight Topco Limited and its subsidiaries.

Signed

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Andrew Cannon, Chief Executive Officer

December 2025

Our previous statements can be viewed below:

Modern Slavery Statement - 2018
Modern Slavery Statement - 2019
Modern Slavery Statement - 2020
Modern Slavery Statement – 2021
Modern Slavery Statement - 2022
Modern Slavery Statement - 2023
Modern Slavery Statement - 2024

Revision History

Author Approver	Version	Review Date	Reason	Review by Date
AM/IE/SQ	1.0 (2019)	01/10/2019	2018 Statement	01/10/2020
IE/SQ/Board	1.0 (2020)	01/10/2020	2019 Statement	01/10/2021
EB/IE/Board	(2020)	01/05/2021	2020 Statement	01/05/2022
IE/SQ/Board	(2021)	01/05/2022	2021 Statement	01/05/2023
ROD/SQ/Board	(2022)	12/05/2023	2022 Statement	01/05/2024
ROD	(2022)	21/07/2023	Updated company name	01/05/2024
FC	(2023)	01/05/2024	2023 Statement	01/05/2025
FC/AC	(2024)	08/06/2025	2024 statement	01/05/2026
LM/FC/ES/PE/AC	2025	31/12/2025	Revised statement to cover the full 2025 reporting period and year-end position	01/05/2026
Fiona Carr/Emma Streater Andrew Cannon	2026	05/06/2026	Annual review with update on progress against targets	05/06/2027