

UK Modern Slavery Act Statement: 2024

INTRODUCTION

This is the first Modern Slavery (“MS”) Statement by Vantive Limited under Section 54 of the Modern Slavery Act. It sets out the steps that Vantive Limited and the broader Vantive group of companies took during FY 2024 to prevent and reduce the risk that MS is taking place in any part of Vantive Limited’s business operations and supply chains.

COMPANY STRUCTURE

- > Vantive Limited is the only legal entity within the Vantive group that operates in the United Kingdom and, as such, it is the only Vantive legal entity covered by this report. Vantive Limited does not operate outside of the UK and has just one subsidiary, Vantive Limited Liability Company, which operates in Greece and has no UK operations.
- > The business of Vantive Limited was formerly owned by Baxter. Vantive Limited was incorporated on July 5, 2023 (original name, BXT Renal Limited) and started operating on April 1, 2024.
- > Vantive became a standalone group of companies on 1 February 2025. This is the first report filed by Vantive Limited, reflecting its MS measures and those of the Vantive group of companies.

ABOUT VANTIVE

Vantive is a global manufacturer and supplier of pharmaceutical products and medical devices. The Vantive group, including Vantive Limited, fosters a culture of compliance with all applicable laws, rules and regulations and the highest standards of ethics and business conduct with respect to all human rights issues, including MS. We do not endorse any form of MS in our operations or in our supplier network.

SUPPLY CHAIN

During the reporting period Vantive Limited was part of the Baxter group and it procured raw materials, products, equipment and services from Baxter and a wide range of other UK and non-UK based suppliers. Vantive Limited was supported in this activity by supply arrangements established by Baxter in compliance with Baxter group policies and procedures designed to ensure responsible business operations.

A high-level overview of Vantive Limited's supply chain is provided in the following table:

No.	Product / Service category	Key Themes
Direct suppliers		
1.	Materials, medical products and equipment	• We engaged directly with Baxter group entities and other UK and non-UK based suppliers that manufacture the raw materials, medical products, components and equipment that we use in our operations, products and services. • We used delivery companies to assist with the distribution of these products into, out of, and across the UK.
2.	Logistics and distribution	
Secondary suppliers		
3.	Materials, medical products and equipment	• Many of our direct suppliers use secondary suppliers to provide raw materials, products and components.
Indirect suppliers		
4.	Office supplies	• To support our core business, Vantive Limited uses a range of other suppliers of goods and services. • These include cleaning services, office supplies, professional services and more.
5.	IT equipment / IT supplies	
6.	Cleaning services	
7.	Professional services	

As part of Vantive's 2030 Corporate Responsibility Commitment and Goals, we aim to integrate Vantive's sustainable procurement strategy across 90% of supplier spend. This will be measured by suppliers' commitment to Vantive's new supplier code of conduct, which is currently in development.

[Baxter's 2023 Corporate Responsibility Report](#) provides more detail about the supply chain related activities of the Vantive business when it was the kidney care segment of Baxter.



DUE DILIGENCE, RISK ASSESSMENT, AND RISK MANAGEMENT

During FY 2024, Vantive Limited and its subsidiary operated under Baxter's policies and procedures as they relate to MS. [Baxter's 2023 Corporate Responsibility Report](#) provides more detail about those policies and processes. It also includes information about supplier risk profiles based on location, performance, and goods and services provided. During 2025, Vantive will be integrating its standalone supplier corporate responsibility strategy into its overall supplier management processes and conduct periodic assessments of key suppliers to evaluate cost, delivery, quality, and risk.

We recognize that our supply chain due diligence should be focused on the areas of highest risk, and this is a core area of focus going forward. We are committed to continuously strengthening our risk assessment process, focusing on countries or materials/products of concern. This is an iterative process, and as part of our management system approach to labour standards and sourcing risks, we aim to continuously improve the quality of information we hold on supply chain risk, combining it with information from other due diligence activities, and taking appropriate action if concerns are found.

One significant way Vantive advances respect for human rights, with regards to all forms of MS, is through its supplier sustainability program. This will involve a survey of Vantive Limited's most critical suppliers to evaluate non-financial performance factors and conduct supplier corporate social responsibility risk assessments. The survey will assess whether these suppliers have programs to address potential human rights risks, including human trafficking and slavery (child, forced or bonded labour), and whether the supplier has had any human rights legislation violations: including prosecution, financial or non-financial sanctions during the reporting year.

Vantive is working with EcoVadis, a globally recognized assessment platform that rates businesses' sustainability practices, to conduct a survey of our suppliers' corporate Responsibility programs and performance in the areas of environment, labour and human rights, ethics, and sustainable procurement. Through this program, Vantive and participating suppliers can access detailed scorecards with information about strengths, benchmark comparisons and improvement areas. We will also leverage the EcoVadis system to create corrective action plans for suppliers falling below our performance standards and to determine when on-site audits will be necessary.



POLICIES AND STANDARDS

[Vantive's Human Rights policy](#) sets out Vantive's overarching commitments around human rights issues. [Vantive's Code of Conduct](#) defines the core principles that govern employee behaviour and business conduct and provides tools and resources to help employees comply.

Vantive Limited also employs a robust local policy framework to prevent all illegal working, including 'right to work' checks for all employees. For contract workers, Vantive Limited has a list of preferred labour hire agencies. During the reporting period, these agencies were subject to Baxter's due diligence and review processes both prior to and during the contractual relationship. Vantive Limited also requires its suppliers to comply with Vantive's standards and expectations as well as all laws governing purchasing.

Vantive has also incorporated rules against all forms of MS into our mandatory [Ethics and Compliance Standards for Suppliers](#). Specifically, the Standards seek to prohibit our suppliers from violating laws governing workers' human rights, trafficking and slavery.

TRAINING

All Vantive employees are required to comply with [Vantive's Code of Conduct](#). The Code of Conduct defines the core principles that govern employee behaviour and business conduct and provides tools and resources to help employees comply with the same. The company conducts mandatory ongoing training and maintains a Code of Conduct intranet site to keep employees informed and aware of Vantive's ethics and compliance requirements and company expectations.

REPORTING

[Vantive's Ethics and Compliance Helpline](#) is the primary vehicle for us to hear from employees and others regarding any alleged contraventions of our integrity standards. The helpline enables any employee to raise concerns, including those relating to respect for human rights, confidentially and without fear of retaliation. External stakeholders, including our suppliers, can also use this Helpline to report human rights concerns.

Vantive enforces a non-retaliatory environment, making it safe for employees and other stakeholders to raise ethics and compliance concerns in good faith. We do not tolerate retaliation against anyone who reports, in good faith, observed or suspected illegal or unethical behaviour or violations.

REMEDIATION OF MS

Vantive Limited did not identify any instances of MS within its business or supply chain during the reporting period.



CONCLUSION

Vantive Limited is committed to continued improvements in its approach to managing MS risk. This commitment requires cross-functional collaboration involving many internal commercial and functional business units, including Procurement, Human Resources, Sustainability and Legal. Vantive Limited will continue to monitor and review its compliance processes, to ensure MS transparency and compliance across its business and supply chain.

This statement was reviewed and approved by the Board of Directors of Vantive Limited.

Signature: *Cassandra Boa*

Name: Cassandra Boa

Title: Director

Date: 25-Jun-2025