



DH OpCo UK Limited

Modern Slavery Statement

for the financial year ending

31 December 2022

Introduction

We, Dedalus, are committed to minimising the risk of slavery and human trafficking in our business and supply chain. Dedalus forbids any form of slavery, human trafficking, forced labour and child labour, and we are committed to complying with applicable laws prohibiting such exploitation.

DH OpCo UK Limited, part of the Dedalus Group of companies, is making this statement — as required by section 54 of the UK Modern Slavery Act 2015 — of the actions that Dedalus and DH OpCo UK Limited (“**Dedalus UK**”) have taken during our financial year ended 31 December 2022, to ensure that modern slavery and human trafficking are not taking place in our supply chain or in any part of our business.

About Dedalus

Business

Dedalus Group is the leading healthcare and diagnostic software provider in Europe, supporting the digital transformation of 6300 hospitals and 5700 Laboratories worldwide, processing its solutions for a population of more than 540 million worldwide. Dedalus supports the whole continuum of care, offering open standards based solutions serving each actor of the Healthcare Ecosystem to provide better care in a healthier planet.

Structure

With a presence in over 40 countries, we have a market leading position in Hospital IT (HCIS) and Diagnostic (DIS) solutions in the United Kingdom, Ireland, Germany, Italy and France. We have a strong market presence in Austria, Switzerland, Spain, China, Brazil, Australia, New Zealand as well as Latin America, the Middle East and Africa.

Dedalus Group employs more than 6,600 highly skilled and qualified people; it has the largest software R&D team in the industry in Europe representing 38% of the overall workforce.

Our supply chains

As a technology group, we purchase software, hardware, services and labour, working collaboratively with our ecosystem partners and wider supply chain to secure the sustainable success of our customers by providing innovative solutions.

Dedalus activities and industries are largely considered low risk for modern slavery. Dedalus does not manufacture any hardware, and our core activities often require specialist skills. Our workforce is highly skilled, and English is the common language across the business. Our core

activities and the industries in which Dedalus operates keep our risk profile low for modern slavery and labour violations.

Policies and procedures

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Dedalus has adopted Organizational Models 231, tailored for each entity involved in their implementation, confirming that they have the correct organizational structure to prevent the corporate crimes listed in Italian Legislative Decree no. 231 of 2001 including slavery, child abuse, human trafficking, slave practices and exploitation of labour.

In 2022 Dedalus updated the Dedalus Group Code of Ethics¹, which sets out the values, corporate culture and the rules of business conduct that employees around the world must comply with. It sets out how, as an international group, we operate with respect for human dignity and human rights, through our operations and in the products and services we offer, requiring the same from our business partners and suppliers. It states our commitments to:

- strive every day to require that slavery, child labour, prison or forced labour, punitive labour, public punishment and human trafficking are never permitted in our operations; and
- prohibit relationships with suppliers that do not comply with the Modern Slavery Act 2015 or similar.

Dedalus UK has adopted the Group Code of Ethics clarifying our commitments to prohibit child labour and the use of forced labour and to ensure our operations are not used to support human trafficking.

Due diligence processes for slavery and human trafficking

The types of services that Dedalus procures — for example, software activities — are largely skilled, requiring high levels of education and specialist knowledge as well as English language skills. These are considered low risk for modern slavery. We have a high level of assurance that there is little risk of modern slavery among Dedalus's suppliers.

In our procurement activities we aim to adopt qualification, selection and monitoring processes based on objective and documentable criteria and in compliance with internal procedures, reference legislation and the principles of fairness, cost-effectiveness and quality.

¹ <https://www.dedalus.com/global/en/esg/code-of-ethics/>

Supplier adherence to our values and ethics

With our suppliers of goods and services we share the values and principles in which we believe, to ensure that our relationships are managed in an ethical and responsible way.

We make our commitments in the Dedalus Code of Ethics public via our websites and we require suppliers to have these commitments explicitly stated in contracts with Dedalus.

Suppliers to Dedalus are specifically required to comply with the Group Code of Ethics through the inclusion of contract obligations in the Dedalus General Conditions of Supply. The Dedalus UK General Conditions of Supply include an obligation on suppliers to take all reasonable steps to ensure that their business and supply chains are free from modern slavery and human trafficking.

Training

We provide regular training to our staff in ethics and compliance matters.

Our effectiveness in combating slavery and human trafficking

At Group level compliance is overseen by our Chief Risk & Compliance Officer. In the UK Dedalus UK has formed a Risk and Compliance Committee that meets monthly to review business risk and compliance matters and act as a point of escalation for issues that would include modern slavery concerns. No risks or concerns related to modern slavery or human trafficking were raised in the year ending 31 December 2022.

In 2022 Dedalus Group started the process of activating a new global tool for the management of whistleblowing reports, which was rolled out to the UK in March 2023.

Board of directors approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes DH Opco UK Limited's slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by the board of directors of DH Opco UK Limited on 12 May 2023.



Colin Henderson, Managing Director

DH OpCo UK Limited

Date: 12 May 2023