

Anti-Slavery and Human Trafficking policy

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms such as forced and compulsory labour, servitude, slavery and trafficking. Healthcare 21 Group and all its associated business entities are committed to acting ethically and with integrity in all its business dealings and in all its relationships and to this end are committed to efforts against Modern Slavery

The Company acknowledges that every supplier and employee deserves the right to live and work with dignity and respect, in reasonable and safe conditions and earn a fair income. The Company has a responsibility to ensure respectable social and ethical practices within its own operations and within its supply chain.

This policy sets out Healthcare 21 Group actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and in its supply chains. Healthcare 21 maintains relationships with many different organisations; suppliers, contractors, as well as with its own employees. The Company is committed to and compliant with the general law on employment and human rights and more specifically, the Modern Slavery Act 2015.

Organisational Structure and Supply Chains

This policy covers all the activities of Healthcare 21 Group and its associated businesses. It governs all its business dealings and the conduct of all persons or organisations with whom it contracts directly or who it appoints to act on its behalf.

The Company expects all who have, or seek to have, a business relationship with Healthcare 21 Group and / or any division within Healthcare21 Group, to familiarise themselves with the Company's Anti-Slavery and Human Trafficking policy and to act at all times in a way which is consistent with it.

Under the Healthcare 21 Group, the UK legal entities are: Healthcare 21 (UK) Limited, Aquilant Limited, Aquilant Endoscopy Limited, Tools for Living Limited, Aquilant Northern Ireland Limited, Medscope Limited, Xograph Healthcare Limited and Cardio Solutions. The Company also operates in Ireland and Germany

Healthcare 21 Group sources both direct finished goods for resale and indirect services. Business Managers and the Procurement and Commercial departments follow a standardised sourcing process for the identification, selection and management of suppliers to the Company. This is risk managed via the Company supplier set-up process and controlled by the Quality & Compliance department. As part of this process, and to ensure obligations are met under the UK Modern Slavery Act 2015, candidate suppliers must meet pre-qualification criteria, in order to be considered for a commercial relationship. One of these criteria is the capability to

provide evidence of both the existence of and implementation of a Anti Modern Slavery policy and to be prepared to have the implementation of this policy audited. This is a dynamic process, by which the Procurement and Quality & Compliance departments monitor to ensure ongoing compliance.

Responsibility

The Quality & Compliance department ensures that all employees are aware and understand this policy.

Healthcare 21 Group and its Procurement and Quality & Compliance departments are responsible for ensuring that all dealings with suppliers, whether contractual or not, comply with this policy.

Healthcare 21 Group adheres to its Diversity and Equal Opportunities policy and fully supports the principles of equal opportunities in employment and opposes all forms of discrimination on the grounds of gender, race, ethnic origin, sex, marital & family status, age, sexual orientation, disability, and political or religious belief.

Healthcare 21 Group mandates all departments adhere to recruitment practices that ensure that all terms of employment are voluntary.

The Company carries out its own recruitment activities and only uses reputable employment agencies to source labour and carry out appropriate background checks. Where necessary and if required, the Company may request demonstration of compliance with this policy.

All recruitment activities follow a detailed process to ensure every candidate is treated appropriately from a legal and welfare perspective.

Where Healthcare 21 Group deals with suppliers who manufacture products outside of the UK, the Company ensures that that these suppliers comply with all local legislation regarding Ethical Trading and Modern Slavery. This is identified through the pre-qualification criteria as part of the supplier sourcing process. All suppliers are expected to familiarise themselves with the Company's Anti-Slavery and Human Trafficking policy and to act in a way which is consistent with this policy at all times. If local legislation differs from this statement, the Company will encourage best practice and changes to supplier processes and offer support to the supplier on how it might achieve compliance.

Healthcare 21 Group response to, and reporting of, concerns raised in relation to suppliers from outside of the UK will be tailored to the local circumstances, legislation, organisations and support mechanisms present in that country.

Healthcare 21 Group operates that practice to describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Healthcare 21 Group encourages all employees to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Company's confidential reporting procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer, confidentially, to the Quality & Compliance Department, HR Department or the Company's external whistleblowing service. The number is 0044 844 892 4413 and is available free of charge, 24 hours per day, 365 days a year.

Due Diligence

On an annual basis, the Quality & Compliance department will review the progress of all required training on this policy. In addition, the Company will raise awareness of modern slavery issues by making it available on the Company website for customers and employees. The Company expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

Healthcare 21 Group will make this policy statement available to members of the public and other interested parties on the Company's website <https://www.healthcare21.eu/>.



David Frederick
Managing Director
Healthcare 21 UK

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