

Modern Slavery Policy

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulation 2015 (the “Act”). It sets out the steps taken by Unite Medical Ltd, to prevent modern slavery and human trafficking in its business and supply chain.

Unite Medical Ltd fully supports the Government’s objectives to eradicate modern slavery and human trafficking and recognizes the significant role we can play in both combating it and supporting victims. In particular, we are strongly committed to ensuring our supply chains and business activities are free from ethical and labor standards abuses.

We recognize that being in the healthcare industry, we are exposed to risks relating to the potential violation of human rights in areas including modern slavery and human trafficking. We are conscious that such risks can arise in certain areas of the sector, in particular nursing, aged care provision, as well as in the manufacturing of healthcare equipment. We are committed to monitoring such risks in our business and in our wider supply chain and to mitigating them.

Steps taken to date include:

People

We promote a workplace environment that is fair, open, and respectful, and one that protects the rights and dignity of all employees. We operate people practices, contracts of employment, and collective agreements that are lawful and aligned with our Code and values.

- We confirm the identities of all new employees, temporary workers, and contractors and their right to work in the United Kingdom and pay all our employees above the National Living Wage.
- Our Respect at Work, Grievance, and Voicing your Concerns for Staff policies additionally provide a platform for our employees to raise concerns about poor working practices.
- We use social media to raise awareness and invest in training to ensure frontline staff are aware of and able to respond to incidents of modern slavery.

Whistleblowing

Our whistleblowing policy sets out our commitment to ensuring people are free to question things and raise anything they are concerned about, specifically modern slavery and human trafficking. We encourage people to speak up by raising matters with their senior manager or the HR department.

Procurement and our supply chain

- Our current due diligence process includes a modern slavery assessment.
- When procuring goods and services, we additionally apply specific Terms and Conditions that require suppliers to comply with relevant legislation.

Spotting and Supporting Victims:

At Unite Medical, we are dedicated to actively identifying and supporting victims of modern slavery within our organisation and supply chain. To achieve this, we have developed comprehensive protocols aimed at recognising the signs of exploitation and providing appropriate assistance to individuals who may be affected. These protocols include:

- **Training for Staff:** We provide specialised training to relevant staff members on how to identify indicators of modern slavery and human trafficking. This training equips employees with the knowledge and skills necessary to recognise suspicious behaviours, working conditions, and other red flags that may signal exploitation.
- **Reporting Mechanisms:** We have established clear and confidential reporting mechanisms for employees to raise concerns or suspicions regarding potential cases of modern slavery. Employees are encouraged to report any observed or suspected instances through designated channels, such as HR, line managers, or our whistleblowing system.
- **Collaboration with Authorities:** We maintain close collaboration with law enforcement agencies, relevant authorities, and anti-slavery organisations to ensure that suspected cases of modern slavery are promptly investigated and addressed. This partnership facilitates the provision of support services to victims and enhances our ability to effectively combat human trafficking.
- **Victim Support Services:** In partnership with local organisations and support networks, we offer comprehensive assistance and resources to individuals identified as victims of modern slavery. This support may include access to safe accommodation, legal aid, counseling, healthcare services, and assistance with repatriation or resettlement, depending on the specific needs of the individual.
- **Non-Retaliation Policy:** We have a strict non-retaliation policy in place to protect employees who report concerns or cooperate in investigations related to modern slavery. We ensure that individuals who come forward with information are safeguarded from any form of retaliation or victimisation.

Resources and Training:

To enhance our efforts in combating modern slavery and supporting its victims, we provide a range of resources and training initiatives for our employees, including:

- **Online Training Modules:** We offer interactive online training modules that cover topics such as identifying signs of exploitation, understanding the legal framework surrounding modern slavery, and guidelines for responding to suspected cases. These modules are accessible to all employees and are regularly updated to reflect the latest developments in anti-slavery efforts.
- **Educational Resources:** We provide educational materials, including pamphlets, posters, and handbooks, that raise awareness about modern slavery and human trafficking among employees. These resources are distributed across our workplaces to ensure widespread dissemination of information and promote a culture of vigilance and solidarity against exploitation.
- **External Support Networks:** We facilitate access to external support networks and resources for employees seeking guidance or assistance in dealing with suspected cases of modern slavery. This may include referrals to local anti-slavery organisations, helplines, or governmental agencies specialising in victim support services.

By implementing these protocols and providing comprehensive resources and training, we are committed to taking proactive steps in identifying and supporting victims of modern slavery, thereby contributing to the broader efforts to eradicate this crime from our society.

Review of effectiveness

We intend to take further steps to identify, assess, and monitor potential risk areas in terms of modern slavery and human trafficking, particularly in our supply chains.

In 2020/21, our anti-slavery program will also:

- Continue to support all staff to understand and respond to modern slavery and human trafficking, and the impact that each and every individual working in the healthcare sector can have in keeping present and potential future victims of modern slavery and human trafficking safe.
- Ensure that staff have access to training on how to identify those who are victims of modern slavery and human trafficking. This training will include the latest information and will help staff develop the skills to support individuals who come into contact with health services.
- Review our safeguarding policies and training programs to ensure that Modern Slavery and human trafficking reflect potential requirements in pending reforms relating to the pre-criminal needs of people involved in human trafficking and modern slavery.
- Undertake a risk assessment on transparency in the supply chain, including an overview of products, services, and suppliers procured.

Date: 26/04/2024

Signed: *Nathan Romeo*

Job Title: Director