

Wright Health Group Ltd Company Policy		
	Revision : 02	CP: 002
	Approved Date: 09/04/2021, reviewed April 2022	Page: 1 of 3
	Effective Date: 09/04/2021	
APPROVED BY: Karen Souter, Finance & Operations Director		Next Review Date : April 2023
Modern Slavery Statement		

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Wright Health Group Ltd has taken and is continuing to take to ensure that modern slavery and human trafficking are not taking place within our business or supply chain.

Wrights continue to work towards establishing a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. Currently, we are unaware of any instances of forced or child labour within our supply chain and are not aware of risk of forced or child labour within our own organisation.

If we find breaches of these laws within our supply chain, we will look to support companies in their efforts to comply with the legislation. We will also actively consider how we support or conduct business with organisations involved in slavery, human trafficking, forced or child labour.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Wright Health Group Ltd expects its suppliers and partners to operate on the same principles.

Our business

Wright Health Group Ltd operates in the UK, Hungary, South Africa and USA and it's principal activity continues to be the manufacture, import and purchase of dental equipment and material of all kinds and the distribution of these products both wholesale and retail in the UK, South Africa, USA and other overseas markets.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- 1. Ethical Employment Standards Policy.** This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- 2. Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- 3. Whistleblowing policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

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Our suppliers

We recognise our Company is exposed to greater risk when dealing with its suppliers, particularly those who have operations/suppliers in other territories. We continue to work toward full implementation of the following measures by the end of 2021 to review and manage this risk:

1. Examination of our supply chains.
We have begun to map our supply chains and we will identify those suppliers to whom we deem to be material on an annual basis.
2. For those which we deem material, we will map these according to location, size and industry, to identify potential indicators of slavery, as follows:
 - a. Identify % of suppliers located within the UK or other low risk countries.
 - b. Identify those companies with an annual turnover of >£36m, who are therefore covered by the Modern Slavery Act requirements.
 - c. Identify % of suppliers in high risk countries
 - d. Identify % of suppliers in high risk sectors

In addition to the above, as part of our contract with suppliers, we are working towards a requirement that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Wrights will continue to:

- Provide awareness training to staff on the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- Ensure that consideration of the modern slavery risks and prevention are added to Wrights policy review process as an employer and procurer of goods and service.
- Review our contract terms and conditions as well as procurement strategies include references to modern slavery and human trafficking.
- We will continue to take action to embed a zero-tolerance policy towards modern slavery.

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Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified. We will also see good levels of communication and personal contact with the supply chain and their understanding of, and compliance with, our expectations.

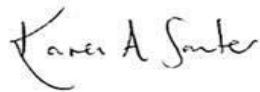
Approval for this statement

This statement was approved on 09 April 2021 by:

Name:

Mrs K A Souter

Position:



Finance & Operations Director

Signature: