ALTHEA
INTEGRATED HEALTHCARE TECHNOLOGY MANAGEMENT

MODERN SLAVERY ACT STATEMENT 2021

Version 05.1 July 2021

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Introduction

This statement sets out Althea UK and Ireland Limited's 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 own business and its supply chains. This statement relates to actions and activities during the year 1 April 2021 to 31 March 2022.

As Althea's business is in the Healthcare sector, Althea recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Althea is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Althea UK and Ireland Limited in its business providing quality managed equipment services for the Healthcare sector both within the NHS and the private sector.

Countries of operation and supply

Althea UK and Ireland Limited currently provides services in the following countries:

- The United Kingdom of Great Britain and Northern Ireland; and
- The Republic of Ireland

Periodically the company assesses whether or not particular activities or countries it is considering entering either as a supplier or customer are high risk in relation to slavery or human trafficking, this is undertaken as a joint process with all applicable departments represented.

Althea requires all employees and managers and suppliers to comply with all applicable laws and regulations with particular attention to human rights, the wellbeing of employees, the relationships with governmental bodies and authorities, suppliers etc. ethical sustainability, safeguarding, fiscal tax correctness and transparency.

Where Althea identifies a particular supplier (or sub-supplier if possible) that could be at risk Althea will work with that party to ensure compliance (including getting documentary evidence) with the principles of the modern slavery act. All procurement contracts are in line with NHS standards and contain applicable obligations and requirements to follow the principles and comply with the act. The nature of these terms do not put undue financial or legal pressure on the Suppliers with payment terms and variation control reflecting NHS Guidelines.

Relevant policies

Althea operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy -** Althea encourages all its workers, customers and other business partners to report any concerns related to the direct activities or the supply chains of Althea. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Employee code of ethics** - Althea's code makes clear to employees the actions and behaviour expected of them when representing the Althea. Althea strives to maintain the highest standards of employee conduct and ethical behaviour when operating at home and abroad and when managing its supply chain.
- **Supplier/Procurement code of conduct** - Althea is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate and provide written evidence where applicable that they provide safe working conditions, treat workers with dignity and respect, act ethically and within the law in their use of labour. Althea works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Serious violations of Althea's supplier code of conduct will lead to the termination of the business relationship.
- **Human Resources Policy -** All employees are selected, and recruited into Althea, based upon their attitude, skill, competency, and aptitude. Management philosophies and practices promote and encourage motivation and retention of the best employees. The employment relationship is based on mutual trust, fairness and equality of opportunity for all. The dignity of all employees is respected by their managers and fellow employees. No employee is subjected to discrimination or bullying of any kind. Compulsory over time is not permitted and employees are permitted to leave their employment (subject to notice) at any time.
- **Recruitment/Agency workers policy** - Althea uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. Worker paid recruitment fees are not permitted.
- **Anti-Corruption and Bribery Policy** – It is Althea's policy to conduct all business in an honest and ethical manner, with a zero tolerance to bribery and corruption in accordance with the Bribery Act 2010.

Due diligence

Althea undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

Performance indicators

Althea has and continues to review its key performance indicators in light of the introduction of the Modern Slavery Act 2015. The indicators monitored are:

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- All staff to complete training on Althea's code of conduct and modern slavery. Where applicable staff working in countries where the risk is greater than our norm shall have completed additional specific training on modern slavery and the impact in that country;
- Ensure supply chain verification is undertaken on a regular basis, with continuous development of the system, whereby Althea evaluates potential new issues and suppliers before they enter the supply chain; and
- Ensure that its existing supply chains are reviewed on an on-going basis.
- Monitor and report on any suspected instances (on a confidential basis if applicable).

Althea is ISO 13485 compliant.

Training

All staff receive training on the company policies including but not limited to Modern Slavery on joining Althea and via regular updates. Where particular risks are identified or where staff are working in areas outside the current arena Althea requires the staff to complete further training on modern slavery and or any particular local risk. Althea's modern slavery training covers (noting that it will be tailored to the specific country/region concerned):

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Althea;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps Althea should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from Althea's supply chains.

Awareness-raising programme

As well as training staff, Althea has raised general awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;

- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within Althea; and
- what external help is available, for example through the Modern Slavery Helpline (www.modernslaveryhelpline.org).

All policies are easily available for viewing and commenting on if applicable on the Althea's intranet page.

Board approval

This statement has been approved by Althea UK and Ireland Limited's board of directors, who will review and update it annually.

Director's signature: 

Director's name: **David Rolfe**

Date: **21 July 2021**