

Modern Slavery/Prevention of Hidden Labour Exploitation Policy

Health Innovations UK LTD (“Health Innovations”) is committed to actively preventing Modern Slavery and all forms of labour exploitation in its corporate activities, and ensuring its supply chains are free from slavery and human trafficking. Health Innovations UK LTD are committed to taking the appropriate steps to eradicate Modern Slavery within our supply chains.

“Modern slavery” refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can then be considered under five headings:

- the sexual exploitation of adults;
- the trafficking of adults into conditions of labour exploitation;
- the trafficking of adults into conditions of criminal exploitation;
- the trafficking of minors into conditions of sexual, criminal or labour exploitation;
- other forms of exploitation.

Commitment

Health Innovations shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- Health Innovations have a zero-tolerance approach to modern slavery and hidden labour exploitation in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- Health Innovations are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- Health Innovations take a risk-based approach to our contracting processes and keep them under review. Health Innovations assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Consistent with our risk based approach Health Innovations require:
 - All employment and recruitment agencies and other third parties supplying workers to our organisation to confirm with this policy.
- As part of our ongoing risk assessment and due diligence processes Health Innovations will carry out audits of suppliers for their compliance with this policy.
- If Health Innovations find that individuals or organisations working on our behalf have breached this policy Health Innovations will ensure that Health Innovations take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Preventing Hidden Labour Exploitation

Hidden Labour Exploitation is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider, including rogue individuals working within these businesses but without the knowledge of management. It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation.

Employment procedures

Health Innovations has procedures in place relating to our employment practices. Health Innovations are committed to providing a fair, safe and inclusive place to work, which includes a clear zero tolerance approach to modern slavery. Examples are:

- Providing the HR Manager with the necessary training to have responsibility for developing and operating Company procedures relevant to this issue.
- Accepting that job finding fees are a business cost, and will not allow these to be paid by job applicants.
- The Company will not use any individual or organisation to source and supply workers without confirming that workers are not being charged a work finding fee.
- Ensuring that all staff responsible for directly recruiting workers are aware of issues around third party labour exploitation and signs to look for and adhere to the relevant Company policies at all times.
- Adopting a proactive approach to reporting suspicions of hidden worker exploitation to the Gangmasters Licensing Authority and police.
- Provide information on tackling “Hidden Labour Exploitation” to our workforce in a variety of formats, including the display of workplace posters, worker leaflets, holding Manager briefings and including information in induction training sessions. Posters and leaflets will be available in multiple languages.
- Encouraging workers to report cases of hidden third party labour exploitation, providing the means to do so and investigating and acting on reports appropriately.
- Positively encouraging and supporting employees and agency workers to report such exploitation which may be occurring within their communities through the procedures detailed in the posters and worker leaflets.
- Requiring labour providers and other organisations in the labour supply chain to adopt policies and procedures consistent with the above. The Company only uses 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. Agencies will be audited on a minimum once per annum.
- The Company participates in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular, such as participation in the ‘Stronger Together’ and ‘Responsible Recruitment Toolkit’ initiative.
- Robust recruitment processes in line with UK employment law, including “right to work” document checks, contracts of employment, and checks to ensure all employees are above minimum working age. Market-related pay and reward, which is reviewed annually.

Supply Chain

Health Innovations expects its suppliers to uphold the same values. Health Innovations will not conduct business knowingly with anyone engaged in slavery and human trafficking practices or knowingly permit them to be carried out in any part of its business. Serious violations of our supplier code of conduct will lead to the termination of the business relationship.

Our standard supplier terms and conditions have been updated to include applicable anti-slavery provisions and similar protection has been secured in all relevant supply arrangements.

Health Innovations will continue to develop and implement the measures mentioned above in respect of our supply chain.

Our sites are independently audited at a frequency determined by risk and Health Innovations maintain full data disclosure under the Sedex System.

There have previously never been allegations of human trafficking/slavery activities against any of our suppliers, but if this changes, then Health Innovations would act immediately against the supplier and report it to the relevant authorities.

Learning

Health Innovations UK LTD will provide information on tackling “Hidden Labour Exploitation” to our workforce through (a variety of formats such as workplace posters, worker leaflets, induction, other training).

Appropriate managers are designated to attend Tackling Hidden Labour Exploitation/Modern Slavery training courses.

Supporting Policies

The Company has in place the following policies reflecting its commitment to acting ethically and with integrity in all its business relationships:

- Anti-Bribery and Corruption Policy
- Equality and Diversity Policy
- Whistleblowing Policy
- Dignity at Work Policy
- Grievance Policy

Approval

This policy has been approved by Health Innovations UK Ltd’s Managing Director, Clare Campbell.