

Modern Slavery Statement for Financial Year 2023-24

Genmed Group Limited, is a private limited company registered in England and Wales with registration number 12434274. The registered office is situated at Genmed House, Unit 1 Lakeside Court, Llantarnam Park Way, Cwmbran, NP44 3GA. Unless we say otherwise, in this statement we use the terms “Genmed”, “we”, “our” and “us” to refer to Genmed Group Limited, including its main trading subsidiary, Genmed.me Limited. Genmed makes this statement to comply with to section 54, part 6 of the Modern Slavery Act 2015 on behalf of itself and all its Group companies (collectively referred to as Genmed in this statement) in relation to the financial year ending 30th September 2024.

Genmed’s position on modern slavery

Genmed recognises that modern slavery can occur in many forms, such as forced labour, domestic servitude, sex trafficking and workplace abuse. We have a zero-tolerance approach to any form of modern slavery. We understand that ethical behaviour is about the culture of an organisation as well as its policies and processes. Genmed 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.

Our Business

Genmed helps clients to gain operational and financial efficiencies through managed services. We add value by reducing the administrative burden for clinical staff, enabling them to concentrate on treating patients. Our purchasing team offer a variety of procurement and supply chain activities including supplier/product rationalisation, implementation of inventory control systems, and carrying out tender activities to reduce spend. The data which we provide helps clients to understand variation and better control costs.

Our Policies

As part of the employee handbook, which we update when there are changes in legislation or business needs, this contains all our policies and reflects how employees can raise any issues in relation to any violation or suspected violation of any law, regulation, or our code of conduct. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Anti-Slavery and Human Trafficking Policy

This policy sets out the organisation's commitment to act ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

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. We communicate directly with all candidates to discuss any work opportunities and to confirm details of any offer made. We have rigorous procedures in place for the vetting of new employees and ensure that we can confirm their identities, and that they are paid above the National Living Wage directly into a personal bank account. All new starters are required to complete an induction which includes information and training on the company policies.

Whistleblowing Policy

At Genmed we operate a Whistleblowing Policy which encourages all its employees to report any concerns related to the direct activities, or the supply chains of the organisation. Our policy is designed 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. The policy encourages people to raise concerns directly with their Line Manager or the Chief Executive Officer (CEO), and contains contact details of an independent charity should an employee wish to seek independent advice on a concern they may have.

Code of Conduct

This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and abroad in managing its supply chain.

Our Suppliers

Genmed operates a supplier policy and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. Our Anti-Slavery Policy forms part of our contract with all suppliers and they are required to confirm that no part of their business

operations contradicts this policy. Any supplier who declares they do not conform with the legislation will be excluded from our approved supplier list.

In addition to the above, as part of our due diligence with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate); and
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.

We may terminate a supplier's contract at any time should any instances of modern slavery come to light.

What we did during 2023 / 24

During the 2023-24 financial year we did the following:

- As part of our supplier monitoring process, we ensure that all our approved suppliers need to confirm that the organisation abides to the Modern Slavery Act 2024 or/and the Criminal Law (Human trafficking) amendment Bill 2013.
- Confirmation that the employees, particularly those in charge of supply chain management, are trained to understand what slavery and human trafficking are and how to mitigate the risk of them in their respective supply chains. We also ask them to confirm that your organisation will be paying as a minimum the Real Living Wage to their employees. This is reviewed every 2 years with follow up reviews starting 2024.
- We set 2 objectives to focus on in compliance with our policy development areas. Below are the 2 focus areas set and how we approached them.
 - I. Annual training programmes for all employees to cover ethical issues: we undertook training to focus primarily in the first instance on awareness and education. For this we completed online training on our training portal "what is modern slavery?" establishing high risk areas and carrying out specific reviews of these areas as a part of Genmed sourcing policy.
 - II. We looked at our contracting areas for the year and made a determination if we believe that there were potentially any high-risk areas, and that further action was required. None were identified.

Future Plans

It is important that our policies and procedures evolve in line with best practice and changing circumstances. To that end and to maintain our commitment to advancing the anti-modern slavery ethos within our business, we have identified three objectives for our financial year ending September 2024:

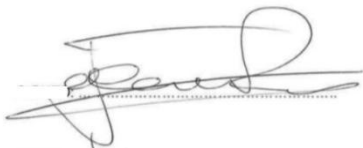
- continue the education and awareness programme with our employees and monitor training compliance rates to ensure that employees understand their responsibility in line with modern slavery and human trafficking.
- continue to monitor all our suppliers ensuring that there is no modern slavery or human trafficking in their supply chains or business, and that they have adequate systems in place to identify, assess, monitor and mitigate potential risk areas in their business and supply chains and to protect whistle-blowers; and
- seek to enhance the identification of potential high-risk category areas in our sourcing activity.

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 our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified. Genmed is unaware of any operations or suppliers identified as having significant risk for incidents of modern slavery or human trafficking.

Responsibility for this statement

We take this very seriously and therefore the responsibility for the prevention of modern slavery sits with the board of directors and senior leaders, who have overall responsibility for this statement and for adhering to internal and external policies and procedures, systems, and controls. This statement is approved by the board of Genmed, who will review and update it annually, and is signed on its behalf by:



Jolene Rayner
Chief Executive Officer
29 Jan 2025