Our Statement on Anti-slavery and Human Trafficking Policy

Policy Statement

This policy applies to all persons working for us or on our behalf of Medicom Healthpro Limited (MHP) in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

MHP strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Definition

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Commitments

MHP 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:

- MHP have a zero-tolerance approach to modern slavery 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.
- MHP are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- MHP take a risk-based approach to our contracting processes and keep them under review. We 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. Using our risked based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code of Conduct.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

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- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we 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.

- MHP will strive to ensure that we adhere to all local and national laws governing anti-slavery and human trafficking.

- MHP workers have the freedom to terminate their employment, have freedom of movement and freedom of association.

- MHP prohibit physical threats of violence, harassment and intimidation.

- MHP prohibit use of worker-paid recruitment fees and compulsory overtime.

- MHP prohibit child labour, discrimination and confiscation of workers' original identification documents.

- MHP expect our suppliers and employment and recruitment agencies to abide by these prohibitions.

Training and Awareness building

All MHP staff have undertaken our in-house Modern slavery training course in person during their induction and then refresher training annually, after an incident, following changes in legislation or to improve best practice.

The following topics are covered in the course:

- Understand the risks of Modern Slavery and Human Trafficking

- Understand how to report suspicions of modern slavery

- Understand the Modern Slavery Statement

- Understand how to consider modern slavery risks in procurement

- Better equipped to undertake modern slavery due diligence for your organisation

Key Performance Index

The following key performance indicators (KPIs) for our modern slavery training course have been introduced.

- Percentage of employees who have received training in anti-slavery

- Percentage of staff who have received refresher training

- Measuring survey responses regarding changes in awareness of modern slavery risk

Read, approved and signed by:

Signature:	Name: Gérald HEULIEZ
Company Name: Medicom Healthpro Ltd	Date: 10/11/2022

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