

MODERN SLAVERY POLICY.

Policy Statement

Richardson Healthcare is medical device manufacturer and provides NHS supply chain and healthcare providers with wound care, surgery, infection control and patient safety products.

This policy statement sets out Richardson Healthcare'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.

Modern slavery is a crime resulting in an abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

Richardson Healthcare has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

The Company also expects the same high standards from all its suppliers, contractors and other business partners.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

The Company 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.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, agents, contractors, consultants and business partners.

Responsibility for the Policy

The Board of Directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Line Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

Richardson healthcare has zero tolerance towards any form of modern slavery and human trafficking. To ensure all those in our supply chain and our Suppliers adhere to our values we

have in place to ensure they are compliant with the Modern Slavery Act 2015 and to provide confirmation of that each year.

We expect our business partners, sub-contractors, and suppliers to:

- Ensure employees have the freedom to choose to work for them and to end that employment after a mutually agreed notice period.
- Ensure employment is not forced, bonded or non-voluntary prison labour.
- Demonstrate a commitment to equality of opportunity for all individuals free from discrimination and oppression.
- Offer working hours that are not excessive and are compliant with national laws or industry standards.
- Have appropriate disciplinary, grievance and appeal procedures in place.
- Have a confidential whistle-blowing process in place where all reported instances are investigated thoroughly, with assurances given to the victims they may give evidence without fear of conviction for offences committed in connection with their enslavement or trafficking. (A person is not guilty of that offence if compelled to act as a result of enslavement or relevant exploitation.)
- Ensure appropriate health and safety measures are in place to protect the workforce and the wider public.
- Offer wages and benefits at least in line with industry benchmarks or national minimums.
- Commit to the eradication of recruitment fees stating that the costs of recruitment should be borne by the employer and not by any employee.

Due Diligence Processes for Modern Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- I. Comply with the Ethical Trading initiative (ETI). We ask that our suppliers adhere to the ETI base code.
- II. Identify and assess potential risk areas to our supply chains
- III. Mitigate the risk of modern slavery and human trafficking in our supply chains
- IV. Monitor potential risk areas in our supply chains.
- V. Protect whistle-blowers with our anonymous hotline

Procurement and Risk Assessment Strategy

Our procurement team have developed a Supply Chain Risk Assessment Process for Modern Slavery. As a procurer of numerous goods and services, it is becoming increasingly important that we undertake our own risk assessment of Modern Slavery in our supply chain.

Practices that come within the ambit of Modern Slavery are numerous, complex and hidden, and to prioritise activity, Richardson healthcare has a strong risk assessment in place.

Richardson Healthcare have a list of current suppliers providing a range of services.

Richardson Healthcare is required to ask itself if it sources goods or services from industries that have a prevalence of modern slavery e.g. clothing and footwear, manufacturing, agriculture, construction, mining, electronics, events/catering and cleaning services work?

To highlight the prevalence of modern slavery practices within our supply chain,

Richardson healthcare is compliant to labour standard assurance system all our suppliers are assessed by

- Supplier Self-assessment surveys and document verification for compliance against the Labour Standards Management System.
- Internal desk audits.

Following the supplier Self-Assessment, in June 2020 Richardson Healthcare identified zero suppliers from which it wished to seek further information to identify whether there was a risk of Modern Slavery occurring within their operations. All our supplier is required to be Labour Standard Assurance System compliant.

The risk assessment will be repeated on an annual basis.

Right to Work

All our employees have a written contract of employment, and their right to work in the UK is established prior to their employment commencing. All employees are made aware of their statutory rights and in-work benefits during their induction process.

Policies and Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the business, and in the supply chains we provide training to our staff during their induction process and annually thereafter.

Richardson Healthcare have the following policies which Richardson Healthcare staff are required to read and become familiar with during their time of their employment:

- Whistle-Blowing Policy – supported by the anonymous Crime Stoppers whistle blowing hotline
- Bribery & Corruption Policy
- Grievance Procedure
- Equal Opportunities
- Gross Misconduct.
- Bullying and Harassment Policy
- Ethical procurement Policy
- Equal opportunities policy
- Human Rights and Responsible Businesses Policy

Richardson Healthcare employees are encouraged to read and understand the relevant policies and procedures when they join the company and throughout their tenure at Richardson healthcare.

Richardson healthcare employees are given training in the key ethical and human rights topics which support the above policies. All policies are readily available to all the employees on the YourHR.space site/Sharepoint if they require to access during their employment, any changes to the above policies are emailed to all employees as part of the change.

It is our intention going forward to continue to work closely with our partners and supply chain in raising awareness of modern slavery, and in establishing effective mitigation protocols.

KPI's

Richardson healthcare uses KPI's of training all staff for modern slavery policy and reviews them on annual basis for continued improvement.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, is the responsibility of all those working for the Company or under the Company's control. Employees are required to avoid any activity that might lead to a breach of this policy.

If anyone believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify their line manager or report it in accordance with the Company's Whistle-blowers Policy.

Raising a Concern

If you have a concern, you may use the Company's Grievance Procedure (please see [Grievance Procedure](#)). If, however, you feel unable to do this for any reason, you should raise their concern with the following individuals:

Office Manager - Janet Demetriou, j.demetriou@richardsonhealthcare.com

Managing Director - Mayur Patel, mp@richardsonhealthcare.com

Telephone at +44 (0)800 170 1126

Where possible, you should put your concerns in writing to outline the nature of the suspected malpractice. Alternatively, concerns can be raised verbally, but you must make it clear that you are raising a concern under the [Whistle-blowers Policy](#), in order to avoid any misunderstanding about the nature and seriousness of the verbal communication. When raising a concern, you must declare any personal interest you have in the matter.

Alternatively employees may also raise concerns by completing the [Reporting Suspected Misconduct Form](#). This form is sent directly to the Managing Director. He will decide how to progress matters and may delegate this to a senior manager. Therefore, if you have any concerns about who should investigate this matter you should confirm this when completing the form.

Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible.

If anyone is unsure about whether an act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, again it should be immediately raised. Matters can also be raised by contacting the government's Modern Slavery Helpline on 0800 0121 700, who are able to provide further information and guidance on modern slavery.

Richardson Healthcare aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Richardson Healthcare is committed to ensuring no one suffers any detrimental treatment

or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

Richardson Healthcare's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to be involved in modern slavery.

Signed

A handwritten signature in black ink, appearing to be "M. Patel", written over a faint horizontal line.

23/07/2020
Mayur Patel
Managing Director