

## **Anser Medical's Modern Slavery Policy 2023/24**

Anser Medical's Modern Slavery statement outlines the approach we've taken, and continue to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain. We have a zero-tolerance approach to any form of modern slavery (slavery, servitude, human trafficking and forced labour).

### **1. Policy Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero - tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our own business or our supply chain; furthermore, we expect all organisations we do business with both internationally and within the UK to adhere to local and national laws and allow their employees:

- the freedom to terminate their employment.
- the freedom of movement to seek employment elsewhere.
- the freedom of association.
- to be free from any threat of violence, harassment and intimidation.
- to be free to choose to do overtime and it not be compulsory.
- to be free from any form of discrimination.
- not to be liable to worker-paid recruitment fees.
- not to be subject to confiscation of their original identification documents.

Anser Medical will not knowingly use unlawful child labour or forced labour in any of the products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilize child labour or forced labour.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels.

### **2. Organisational Structure and Supply Chains**

Anser Medical is a UK based SME with a focus on the procurement, storage, and distribution of medical devices to the UK healthcare sector, with premises in two locations, which comprises an administration headquarters and a storage and distribution facility respectively.

Our CE certified medical devices are sourced from Europe and Asia, and we recognise that our supply chain contributes the greatest risk for Slavery and Human Trafficking.

### **3. Due Diligence**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Obtaining a signed statement at Director level, that the supplier's organisation will abide by our Modern Slavery Policy stated above or provide a copy of their own Modern Slavery Policy.

### **4. Performance indicators**

To mitigate the risk for Slavery and Human Trafficking within our supply chain, we undertake due diligence when taking on new suppliers as part of our ISO9001 Q (8.4-CEP\_ Criteria for external providers\_V5) and require them to adhere to this policy, and annually review our existing supply chain using the following key performance indicators (KPIs):

- a. Ensure we pay our suppliers promptly at or around 30 days.  
Achieved FY22-23 : 34±4 days.
- b. Ensure all existing and new suppliers confirm in writing their adherence to this policy.  
Achieved FY22-23: 71.4% suppliers.
- c. Objective FY23-24: Meet with suppliers in person to ensure compliance with our MSP.

This policy does not form part of any employee's contract of employment and is updated each financial year.

### **5. Responsibilities for the policy**

The company Directors have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. The compliance manager has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and auditing internal control systems and policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains. Managers are responsible for ensuring that those reporting to them understand and comply with this policy.

### **6. Compliance**

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

If any employee believes or suspects a breach of or conflict with this policy has occurred or may occur, they must notify the Managing Director. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Anser Medical's business or supply chains as soon as possible. If they are unsure about whether a particular act, the treatment of workers or their working conditions within any of Anser Medical's supply chains constitutes any of the various forms of modern slavery, then they need to raise this with the Managing Director. Alternatively, the Government's Modern Slavery Helpline can be contacted on 0800 0121 700 for further information and guidance on modern slavery.

Anser Medical 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. We are committed to ensuring no one suffers any detrimental treatment or victimisation because of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of the business or its supply chain.

## **7. Training and communication**

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chain, will be provided to employees as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases. Anser Medical's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering new or renewed contracts with them.

## **8. Breach of this policy**

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct. Anser Medical may terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

## **9. Relevant Policies**

The organisation operates the following easily accessible 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:

- Corporate Social Responsibility Policy (7.4.1-AMCRP\_Anser Medical Corporate Social Responsibility Policy\_V1)
- Equal Opportunity Policy (7.4.1-AMEOP\_Anser Medical Equal Opportunity Policy\_V1)
- Health and Safety Policy (7.4.1-Anser Medical Health and Safety Policy Statement\_V1)
- Labour Standards Policy (7.4.1-AMLSP\_Anser Medical's Labour Standards Policy \_V1)
- International Labour Standards Policy (7.4.1-IEPLSP\_International External Provider Labour Standards Policy\_V1)
- Whistleblowing policy (7.4.1-Anser\_Medical\_Whistleblowing\_Policy\_V1)

The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Reviewed and Verified: 12th February 2024  
By:

Managing Director.