

Modern Slavery Statement

Introduction

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.

Anatomical Concepts UK Ltd (The Company) has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Organisational structure and supply chains

This statement covers the activities of Anatomical Concepts UK Ltd who are suppliers of rehabilitation products (including medical devices), their accessories and related services to the NHS, private companies, charities, health professionals and end users.

We provide these products and services within the UK and the Republic of Ireland. Our supply chains are limited and we procure goods and services from a restricted range of US and EU overseas suppliers. We aim to build relationships with our suppliers to ensure they comply with our values and that they are aware of our commitment to protect human rights and the environment. As part of our procurement processes, we require all of our suppliers to comply with the requirements of the Modern Slavery Act and include appropriate contractual obligations within all of our commercial agreements.

Responsibility

The Company Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Company Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Company Director.

Policies in relation to the Modern Slavery Act 2015

The Company operates the following 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:

- Employee code of conduct
- Whistleblowing policy
- Supplier code of conduct
- Diversity and inclusion policy
- Recruitment and selection policy

Performance indicators

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation:

- is updating their system for supply chain verification expected to be in place by November 2023 whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- is reviewing its internal Learning Management System to include updated Modern Slavery Training e-learning, expected to be in place by September 2023

Training

The organisation requires all staff within the organisation to complete training on modern slavery as a module within the organisation's wider ethics training programme.

The organisation's modern slavery training covers:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating a series of emails to staff.

The emails explain to staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

- what external help is available, for example through the Modern Slavery Helpline.

Statement Review

This Statement shall be reviewed and updated annually or following any changes in legislation or regulations.

Any necessary revisions or updates will be made to address emerging risks and changing circumstances, to ensure its effectiveness and compliance with applicable laws and best practices.

Reviewed & Approved by	Carolyn Jones	Position	Director
Date of this Revision	December 2022	Date of Next Review	December 2023