

CLINIMED (HOLDINGS) LIMITED
GROUP STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015

INTRODUCTION BY THE BOARD OF DIRECTORS

The Clinimed Group adopts a zero tolerance approach to any supplier, representative or business partner found to be involved in slavery, servitude and forced or compulsory labour, or human trafficking, and will continue to strive for the highest ethical business practices throughout the Group and its supply chain. To this end, we shall continue to put into place practices and policies which support the aspirations and objectives of the Modern Slavery Act 2015. We are committed to improving our practices to combat slavery, human trafficking and child labour.

OUR STRUCTURE

Clinimed (Holdings) Limited is a privately owned company with headquarters in High Wycombe, Buckinghamshire, and it has seven wholly owned, UK based, subsidiaries:

Clinimed Limited, a distributor of medical devices in the fields of ostomy, wound and continence care, based in High Wycombe;

Securicare (Medical) Limited, also based in High Wycombe, which provides specialist nurses to the NHS, and holds a Dispensing Appliance Contractor's licence to dispense ostomy products on prescription. It has a team of specialist nurses, a patient services department to support its patients, and has its own online pharmacy, which uses the trading name Pharmacare;

Welland Medical Limited, based in Crawley, West Sussex, designs and manufactures ostomy appliances which it supplies to the UK market through Clinimed Limited, and to the rest of the world through its distributor network;

Flexible Medical Packaging Limited, which blends and packages various medical devices for a range of customers, including Clinimed Group companies, within its Clean rooms in Lancaster and Morecambe;

Helapet Limited, based in Houghton Regis, Bedfordshire, which distributes clean room consumables to aseptic units throughout the country and undertakes the manufacture of wipes, cleaning solutions and filters at its facility, from its Clean rooms;

Careflex Limited, which manufactures specialist seating at its base in Newton Abbott, Devon and supplies its products to NHS Trusts, Care Homes and private individuals through its own sales force and distributors.

Hydrokem Aerosols Limited, a specialist aerosol company, manufacturing a range of medical, personal care, household and technical products.

Clinimed (Holdings) Limited, as the parent company, provides legal, financial, HR and overall direction to the Group from its offices in Marlow, Buckinghamshire.

The Group has a global annual turnover such that it is required, at Group level, to publish a statement on its approach to modern slavery and human trafficking.

OUR SUPPLY CHAINS

We have considered our main sources of supply of goods and raw materials, recognising that a proportion of our business is intra Group. Our biggest customer in the UK is the National Health Service. However, we recognise that we also operate through distributors which, particularly in Welland's case, are situated around the world. We regularly meet with all our distributors and Welland, additionally, invites all its distributors to regular distributor meetings in the UK. Due to the global pandemic, the distributors meeting, which is usually held annually and had been set for March 2020, had to be cancelled at short notice. However, Welland was able to hold a meeting, albeit virtually, early in 2021. The overwhelming majority of our distributors around the Group are individuals or companies we have been working with over the long term: we know them well, and they know us as a Group with highly ethical standards.

Our raw materials and distributed goods are mainly sourced from within the UK (including our own Group companies) or Europe but we also have certain suppliers in other parts of the world and continue to add new suppliers.

Our supplier agreements include an acknowledgement and acceptance of the principles set out in our Modern Slavery statement, and these agreements continue to be rolled out to new and existing suppliers.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have continued to implement and improve systems which seek to:

- Fully understand our supply chains.
- Identify and assess potential risk areas in our supply chains, including having regard to the geographical location of suppliers and the monitoring of such locations against the Transparency International Corruption Perceptions Index.
- Auditing our suppliers. Where possible, this includes physical audits worldwide, which provide an opportunity to observe and converse with workers at supplier premises.
- Audit provides the opportunity to work with suppliers to mitigate the risk of slavery and human trafficking should they be found to be occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Brexit

The changed supply operations necessitated by the UK's withdrawal from the European Union have required us to get closer to our suppliers to ensure that essential materials have continued to be available with little other than unavoidable issues, and to our customers to agree methods and timings of delivery, and flexibility therein.

EMPLOYMENT PROCEDURES AND POLICIES

- Recruitment policy. We operate a robust recruitment policy, including conducting 'eligibility to work in the UK' checks for all potential staff to safeguard against human trafficking or individuals being forced to work against their will.
- Protection of Employees – by maintaining and communicating clear policies and procedures, for example, effective grievance and whistle blowing policies, all staff know that they can raise concerns about how they and their colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our policies are designed and strictly adhered to as reassurance to our workers that our Group treats them fairly, equally and transparently and complies with all relevant legislation and best practice.
- We only employ agency workers through reputable employment agencies.

As much of the work we do involves the NHS, we are also required to adhere to its high standards of ethical requirements and its policies on such matters, and our own policies are to a large extent shaped by the requirements placed by the NHS on its suppliers of goods and services.

Coronavirus

The global pandemic had the potential to significantly affect our businesses and staff health, safety and wellbeing. Our businesses continued to operate throughout the pandemic, as workers were reassured, and took pride in the fact, that we are suppliers of health care related goods, and that they are essential key workers.

Our HR departments played a key role in keeping abreast of changing government regulation and guidance as the virus itself hit with differing severity at different times and in different areas of the country. At all times, staff were kept informed about the guidance and local situation relevant to them.

Our working practices and methods were risk assessed and recommended adaptations made to ensure that social distancing, mask-wearing and hygiene guidelines were facilitated. Employees were fully supported throughout and were not adversely affected financially or compelled to work in unsafe situations. Where home working was possible, this was facilitated with appropriate equipment provided and contact maintained to ensure, as far as possible in the circumstances, good mental health. As more staff wish to return to our offices, rota systems are being operated.

At some of our companies, the local Health and Safety Executive carried out unannounced Covid inspections and found our working practices and environment to be in accordance with safe working standards.

POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

SUPPLIER ADHERENCE TO OUR VALUES

To ensure all those in our supply chain and contractors comply with our values we continue our work to put in place a supply chain compliance programme, involving the due diligence steps outlined above, an approach to our main suppliers to ask them about their own work in this area, and the dissemination of this statement to them. This work is already well underway at our largest company Welland, with appropriate questions and sections concerning ethical practices being added to our Supplier Risk Assessment (reviewed quarterly) and Supplier Monitoring and Ongoing Evaluation Procedure. During the coming year, we shall begin to roll out this approach to other Group companies.

During the past year work at a senior level, has continued at Clinimed to maintain accreditation to and compliance with the NHS Labour Standards Assurance Scheme (level 2). As this Scheme transitions to the (more robust) requirements of the Modern Slavery online assessment ("MSAT"), we shall be working to make any recommended improvements without delay. The MSAT is a modern slavery risk identification and management tool. This tool has been developed by the Government to identify risk of modern slavery, reduce identified risks and improve protections for workers in its supply chains. Public sector organisations are being encouraged to use the MSAT with existing suppliers, and as a supplier to NHS organisations, we support and shall aim to optimise and improve our submission. Additionally, our submission will help inform development of the processes and procedures we expect to see from our own suppliers to the wider Group, taking a risk-based approach.

Hydrokem remains a member of Sedex and as such is audited annually. Sedex is one of the world's leading ethical trade service providers, which works to improve working conditions in global supply chains.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we shall make our staff aware of the issue of modern slavery and the company's attitude to it, whilst continuing to foster an environment in which all our staff feel empowered to, and secure in, raising any concerns they may have.

Welland has ensured that its procurement professionals are members of CIPS (Chartered Institute of Purchasing and Supply) which, as an organisation, has a wealth of guidance and online training available. We shall encourage procurement staff to carry out this training and to use the CIPS website for further guidance in this field.

FURTHER STEPS

We shall continue to review compliance throughout the coming year, and future statements will demonstrate the development and the attainment of the goals expressed herein.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2020. It has been approved by the Board of Directors of Clinimed (Holdings) Limited.



Nigel D Piercey,
Group Chairman,
Clinimed Group of Companies

Date: 10th June 2021