



POL13: MODERN SLAVERY POLICY

Rev: 04

HENLEYS MEDICAL SUPPLIES LTD.

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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.

Henleys Medical Supplies is dedicated to taking a zero-tolerance approach to modern slavery in all forms, and is committed to acting ethically and with integrity in all business dealings and relationships. Henleys Medical Supplies shall implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere within the business, including, where practical, the supply chain.

Henleys Medical Supplies is committed to ensuring a transparency within the business and in the approach the company takes to tackling modern slavery. Suppliers, contractors, and other business partners are expected to adhere to these high standards, and included within the supplier approval process are specific prohibitions against the use of forced, compulsory, or trafficked labour.

Company policies are available electronically at all times to internal employees, and externally upon request.

2. Policy

2.1. Scope

Henleys Medical Supplies is dedicated to taking a zero tolerance approach to modern slavery in all forms, and is committed to acting ethically and with integrity in all business dealings and relationships. The purpose of this policy is to document our commitment to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the business.

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

2.2. Responsibilities

2.2.1. Departments

The Purchasing Department has overall responsibility for ensuring this policy complies with Henleys Medical Supplies' legal and ethical obligations, and that all those under our control are also compliant.

The Regulatory & Compliance Department is also responsible for undertaking due diligence when considering new suppliers and reviewing existing suppliers as appropriate. This process is controlled by an internal procedure, and includes building long-standing relationships with suppliers, making our expectations clear, evaluating the modern slavery risks of each new supplier, and invoking sanctions against suppliers that fail to improve in this regard. This policy is sent to all prospective suppliers.

2.2.2. Directors

The Purchasing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries, and aiding internal audits.

2.2.3. Senior Management/Managers

Management at all levels are responsible for ensuring that those reporting to them understand can comply with this policy, and are given any required training.

2.2.4. All Employees

Employees at all levels are required to read and understand this policy. The prevention, detection, and reporting of modern slavery in any part of the business or supply chain is the responsibility of all those working for or under the control of Henleys Medical Supplies. All employees are therefore required to avoid any activity that might lead to, or suggest, a breach of this policy.

2.3. Detection & Reporting

Employees must notify a manager or the Purchasing Department as soon as possible if a conflict is suspected to have occurred, or may occur in the future. Employees are encouraged to raise concerns about any suspicion of modern slavery in any parts of our business or the supply chains at the earliest possible stage.

Henleys Medical Supplies encourages openness, and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Henleys Medical Supplies is committed to ensuring no one suffers detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of any form is or may be taking place.

2.4. Breaches

Any employee who themselves breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Henleys Medical Supplies may terminate a relationship with other individuals or organisations working on our behalf, including suppliers, if they breach this policy.

2.5. Training & Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking within our organisation and supply chains, Henleys Medical Supplies provides relevant training. This policy is always available to employees on the shared drive, and it is provided to all new suppliers. Suppliers are also encouraged to train their own staff and suppliers.

3. Review

This policy shall be maintained and reviewed by the Managing Director.



Danielle Henley, Managing Director

4. Revision History

Revision	Modified by	Date	Description of Change
01	Andy Cleveland	October 2016	Initial issue.
02	Vikki Patis	April 2017	Annual review.
03	Vikki Patis	April 2018	Annual review. New format.
04	Vikki Patis	December 2020	New format.