



CliniMed Limited Labour Standards & Modern Slavery Policy

CliniMed Limited is engaged in the business of storage and distribution of healthcare products to Hospitals and Wholesalers.

This Policy confirms our commitment to comply with the principles of the Labour Standards & Modern Slavery Assurance System during the course of our commercial activities, as set out in the NHS Supply Chain Supplier Code and with reference to the Ethical Trading Initiative base code and the UN Global Compact. We require that this commitment be adopted by relevant key suppliers in our supply chain. CliniMed Ltd will comply with local laws in all countries from which products are sourced.

Scope of the Policy

CliniMed Ltd has implemented this policy in respect of the products supplied to the NHS via the following framework agreement: -

- NHS – All frameworks

This policy seeks to ensure compliance with the Labour Standards & Modern Slavery and as such extends its scope to CliniMed Ltd direct operations, tier 1 suppliers of relevant products and their immediate subcontractors.

Policy Review and Continuous Improvement

CliniMed Ltd will review this policy periodically in line with the level of risk identified in the supply chain, Labour Standards & Modern Slavery policy, NHS requirements in respect of eligibility to supply and legislation changes in order to ensure adequacy, suitability, and continuing effectiveness. The organisation is committed to continuous improvement of its Labour Standards & Modern Slavery.

Top management have committed to ensuring that sufficient resources are available, both financial and personnel, to ensure oversight of the Labour Standards & Modern Slavery through relevant parts of the supply chain.

Labour Standards & Modern Slavery

CliniMed Ltd has identified the following reasons to establish a comprehensive system of Labour Standards & Modern Slavery to guide its business operations.

- To ensure decent working conditions and rights for those working within CliniMed's direct operations
- To ensure decent working conditions and rights for those working within CliniMed's supply chain
- To identify and mitigate risk of (Labour Standards & Modern Slavery) non-compliance in the supply chain
- To meet the needs of our customers
- To procure and operate responsibly and ethically
- To ensure continuity of supply
- To drive sustainable quality standards
- To build resilience in our supply chain



This particularly applies to the following risks:

Child Labour: CliniMed Ltd shall not employ young persons who are under the legal age for employment. If young workers are engaged for the purpose of work experience, then appropriate checks will be carried out to ensure they are not exposed to any harmful conditions and working day is limited to 8 hours.

Forced or Compulsory Labour: CliniMed Ltd shall not engage in and shall adopt a zero-tolerance approach to any supplier, representative or business partner found to be involved in slavery, servitude or the use of forced or compulsory labour, or human trafficking. Employment is freely chosen and employees may freely leave as per the contractual notice period. CliniMed does not operate any unpaid internship schemes. CliniMed Ltd shall continue to put into place practices and policies which support the objectives of the Modern Slavery Act 2015 in spirit as well as letter.

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. This is set out in Human Resources Policy HR49.

Working Hours and Remunerations: CliniMed Ltd complies with the respective national laws and regulations with regard to working hours, wages and benefits. Our working hours do not exceed 48 hours per week and overtime hours do not exceed 12 hours per week (unless staff voluntarily opt out of the Working Time Regulations).

Discrimination: CliniMed Ltd prohibit any discrimination on the grounds of gender, marital status, sexual orientation, pregnancy, race, colour, ethnic origin, nationality, religion or belief, disability, age, political opinion, trade union membership or any other legally protected status or form of harassment on any grounds. Furthermore, we do not discriminate on the grounds of part-time status or 'spent' criminal convictions.

Health & Safety: CliniMed Ltd recognise the importance and our duty to protect the workforce to ensure a safe and healthy workplace environment and to take effective steps to prevent potential accidents and injury to employee’s health by minimising the risk to its employees. All employees will receive safety training during their employment. Employees are encouraged to report any potentially unsafe working practices or breaches of standard procedures. Employees will have access to clean toilet facilities and drinking water. The Operations Director has been assigned the task of health and safety policy duties.

Freedom of Association: CliniMed Ltd agrees to abide by UK laws pertaining to this matter.

Improper Payments/Bribery: CliniMed Ltd complies with international anti-bribery standards as stated in the United Nations’ Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010 and in line with our trade association code of conduct in relation to dealings with Health Care Professionals (HCPs).

Communication

CliniMed Ltd will communicate the above to its key suppliers relevant to the products within scope and requires their commitment in turn. We expect our key suppliers to identify their direct sub- contractors and disseminate our policy accordingly. Where suppliers are located in a country other than the UK,



suppliers should comply with relevant local legislation. Suppliers are required to complete the CliniMed Labour Standards & Modern Slavery Self-Assessment Questionnaire and confirm they have read and understood the Policy, evidence of which will be retained.

This policy is publicly available on the company website at www.clinimed.co.uk and is available to all CliniMed employees via the 'About Our Company' section of the company Intranet.

Signed by:	<small>DocuSigned by:</small> <i>Ben Miles</i> <small>DD0370826EA4403...</small>	04-07-2023
	<hr/> Ben Miles Managing Director	<hr/> Date