

HS Clement Clarke Holdings	
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Prepared by: Kennedy Reed	Approved by: Gino Ostacchini
Updated: 23 April 2021	Issue No: 1

## 1. **MODERN SLAVERY STATEMENT**

We have a strong focus on purpose, and our sense of social responsibility ensures we speak out on the issues that impact our customers, our employees and our industry. Our policy is to assess and address anti-modern slavery laws in our own business and we expect organisations with whom we work also to adopt and enforce policies to comply with the legislation. Collaboration is at the heart of achieving this with our employees, customers and suppliers.

We are strongly opposed to modern slavery and we strive to act ethically and with integrity in all our business dealings and relationships to ensure that modern slavery is not taking place within our organisation or our supply chains.

This statement provides some background to our organisation and our supply chains. It also sets out the steps that we have taken to ensure that modern slavery are not taking place, either in our organisation or within our supply chains.

Gino Ostacchini

Justin Evans

Dean Johnson

## 2. **MODERN SLAVERY**

Modern Slavery is an international crime affecting over 40 million people around the world. This growing global issue transcends age, gender and ethnicities. It includes victims trafficked from overseas and vulnerable people in the UK who are forced illegally to work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing.

The Modern Slavery Act 2015 (the Act) requires commercial organisations that supply goods or services to prepare and publish an annual Modern Slavery Statement that must set out steps the organisation has taken to ensure that slavery is not taking place in its supply chain.

## 3. **OUR COMPANY AND SUPPLY CHAINS**

The Clement Clarke Holdings Group of Companies (John Weiss & Son, Haag Streit UK and Clement Clarke International) manufactures and supplies a range of medical devices throughout the world.

We recognise our obligation to provide our customers with high quality, professional goods and services at a competitive price whilst ensuring that at no point is any person in any part of the supply chain exploited or treated in a

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way that breaks any legislation. We are fully aware of the responsibilities to which we bear to all parties involved in each of the stages involved in producing our products and have, therefore developed policies to outline the standards we, and ultimately all stakeholders involved in the business, should seek to adhere. The Company shall show a preference, where appropriate, to suppliers with higher labour standards.

Our Labour Standards Assurance Policy (PPM048) aims to promote understanding and awareness of employment law and ethical standards. By detailing our labour standards to all parts of our supply chain we hope to develop better ethical standards by motivating our suppliers to adhere to it. It also describes the standards required of potential suppliers. The Company encourages all parties in our supply chain to develop their own labour standards system and provide help and support to allow them to do this.

Our main objective is to become a progressive ethical company and comply at a minimum Level 2 of the NHS Supply Chain's Labour Standards Assurance System

#### 4. **OUR POLICY**

Our policy is to assess and address the risks of violations of anti-modern slavery laws. We adopt procedures that contribute to ensuring modern slavery does not occur in our business or supply chains and we expect organisations with whom we do business to adopt and enforce policies to comply with the Act.

We support our employees, suppliers and customers to address issues arising from modern slavery. Integrity is one of our Corporate Values together with Teamwork, Respect for People, Ethical and Sustainability underpin our culture and how we do business. We ensure:

- Our Corporate Values are embedded throughout our business and these set the parameters for how we expect our employees to behave with colleagues, customers and the world at large.
- We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted.
- Our policies and procedures relating to the Act are in line with our culture and values.

#### 5. **OUR POLICIES AND PROCEDURES**

We have a number of policies and procedures in place that contribute to ensuring modern slavery does not occur in our business or supply chains. Our key policies and procedures which contribute to minimising the risk of modern slavery are as follows:

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**Labour Standards Assurance System Policy (PPM048)** - the aim of this policy is to promote understanding and awareness of employment law and ethical standards. By detailing our labour standards to all parts of our supply chain we hope to develop better ethical standards by motivating our suppliers to adhere to it. It also describes the standards required of potential suppliers.

**Bullying Policy and Procedure (PPM003)** - employees have the right to be treated with dignity and respect. The aim of this procedure is to protect employees from bullying and to enable them, if necessary, to make a complaint or assist in an investigation without fear or reprisal.

**Whistleblowing Policy and Procedure (PPM040)** – the Company encourages all employees, workers, contractors, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Company. This includes any circumstances that may give rise to unethical behaviour of any kind.

**Health and Safety Policy and Procedure (PPM017)** – a key aim of which is to ensure the wellbeing of all our employees and anyone else who may be affected by our activities.

**Human Resources Procedures** – we have employment policies that protect our employees from unfair treatment and promote a fair and inclusive workplace. We have a robust recruitment process that includes “right to work” document checks and Employment Contracts.

**Evaluation, Selection and Monitoring of Suppliers Policy (P0025)** - the objective of this policy is to ensure that the initial supply of material, factored product or services from an outside source is of a satisfactory nature and then to monitor supplier performance thereafter.

**Anti-Bribery Policy and Procedure (PPM044)** – reminds our employees to take account of any improper or suspicious behaviour or situations, and to report and deal with the risk of fraud and corruption.

## 6. TRANSPARENCY IN OUR SUPPLY CHAIN

We annually map all our Tier 1 suppliers to identify and assess risks associated with labour practices, utilising resources from the Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) where possible. In selecting suppliers, the Company conducts diligence activities to assess those risks and to verify that the supplier will comply with our standards as well as applicable labour standards laws. The Company uses this risk assessment to determine which suppliers will be subject to an audit. Audits may be performed by our trained Company representatives or an independent third party.

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## 7. **TRAINING**

The Company has committed to training relevant employees in order to be competent with handling labour standards issues including modern slavery, all such training is documented on our HR System. Employees involved with labour standards assurance will have a good understanding of how the Company operates with the knowledge of the supply chain, be in a position to contact suppliers and build a relationship with them and be trained in the Labour Standards Assurance System requirements. We also encourage our suppliers to carry out appropriate labour standards training within their organisations.

