

MODERN SLAVERY STATEMENT

INTRODUCTION

This statement has been published in accordance with the Modern Slavery Act 2015. Our statement demonstrates our measures and methodologies for the prevention of Modern Slavery and Human Trafficking throughout our business and supply chain. Collaboration is at the heart of achieving this with our employees, customers, and suppliers.

We recognise that Modern Slavery and Human Trafficking can occur in many forms, such as forced labour, sex trafficking and workplace abuse. This growing global issue transcends age, gender and ethnicities and includes vulnerable victims trafficked from both overseas and from the UK.

We have a zero-tolerance approach to Modern Slavery and Human Trafficking and are fully committed to preventing it in our operation and supply chain. We have taken robust steps to tackle these issues and this statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business and to implement steps to prevent Modern Slavery and Human Trafficking during the financial year 2024 – 2025.

OUR ORGANISATION AND SUPPLY CHAIN

Haag-Streit manufactures and supplies a range of ophthalmic medical devices throughout the world. We have been supplying medical devices to the NHS and private healthcare providers for over 100 years.

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 is exploited or treated in a 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.

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), Stronger Together 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.

If there is any evidence that a supplier is non-compliant with our policies or the law, we will take action to address the shortfall, either through a performance improvement plan or, ultimately through termination of the relationship. To date, we haven't been made aware of any allegations of human trafficking/slavery activities against our suppliers.

OUR POLICY, POLICIES AND PROCEDURES

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.

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:

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, Harassment and Discrimination 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.

DUE DILIGENCE

As a company, we firmly believe that by understanding and acknowledging the past and present activities of our customers and suppliers, we put ourselves in a greater position to actively avoid engaging with third parties whose actions are contrary to Modern Slavery and Human Rights legislation.

ACTIONS TAKEN IN THE LAST 12 MONTHS

A review of the Act and its provisions along with any developments has been undertaken and updates have been made to our Modern Slavery Statement.

A review of the existing training provided to employees has been undertaken and employee training needs assessed.

Environmental, Social and Governance (“ESG”) training has been provided to the relevant employees and an Environmental and Sustainability Policy has been developed and published on both the Company website and the internal HR System.

ACTIONS TO BE TAKEN IN THE NEXT 12 MONTHS

To continue to reassess the risks posed to the business in connection with the Act.

To continue to work with our suppliers to ensure the integration of our Supplier Code of Conduct within our procurement processes. We will update our Supplier Policies to ensure that Modern Slavery is considered during each stage of our procurement process.

We will update our Supplier Policies so that the initial risk is evaluated by the Purchasing Team with those suppliers deemed higher risk being escalated to the Senior Management Team for further review.

Social Audits will be included in our internal audit plan. These audits will measure and help to improve our own social and ethical performance in addition to ensuring our suppliers meet standards for ethical labour and supply chain practices.

To develop and deliver specific training sessions on the Act to all relevant employees.

To continually review the provisions of the Act as applicable to our business activities.

MODERN SLAVERY TRAINING

We provide training for new and existing employees on our Code of Conduct as well as other policies. We tailor our training to specific roles. Going forward Haag-Streit will strengthen training on Modern Slavery and Human Trafficking, particularly with respect to mitigating risks within the supply chain with employees who have direct responsibility for supply chain management.

All employees involved in our supply chain and recruitment have been trained on our Modern Slavery Statement. Training is reviewed annually during performance assessments or as and when required.

KEY PERFORMANCE INDICATORS

We have set the following key performance indicators (KPI’s) and targets for delivery between now and the end of 2025. These KPI’s will be subject to review at the annual Management Review Meeting.

KPI 1: Training of employees on modern slavery issues and awareness.

Target: 80% of all employees (with priority given to those involved in our supply chain) to be trained on modern slavery issues and awareness.

KPI 2: Whistleblowing reporting mechanisms monitored for cases involving modern slavery and cases dealt with appropriately and efficiently.

Target: 100% of cases recorded through reporting procedures handled appropriately and efficiently.

KPI 3: Capacity building of our major suppliers to develop modern slavery policies.

Target: 80% of our Tier 1 suppliers to develop a modern slavery policy or guidelines.

In addition to the above measures, we will also report annually, at the Management Review Meeting, on the below measures of success:

Number of cases with modern slavery indicators identified.

Number of modern slavery cases successfully remediated.

Number of assessed suppliers that have a Modern Slavery Statement.

Number of assessed suppliers that have a whistleblowing mechanism.

The Managing Director, Company Director and Senior Management Team are responsible for ensuring this policy is implemented throughout Haag Streit UK. We will continue to review and improve our practices to identify and to, the fullest extent practicable, eliminate modern slavery and human trafficking from our business.

This Policy was approved on 6th November 2024 and will be communicated to all stakeholders and will be reviewed annually as part of our management review.

Signed by the Executive Board:



Dean Johnson
Managing Director



Gino Ostacchini
Company Director

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