

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 its annual distributors meeting in the UK. 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 are currently being rolled out to new and existing suppliers.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We shall continue to implement and improve systems which seek to:

- Fully understand our supply chains.
- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.

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, all staff know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

- We only employ agency workers through reputable employment agencies.
- We have a Whistleblowing Policy in place to assure workers of the companies' compliance with the law.

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.

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 shall be putting in place a supply chain compliance programme, which will involve 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.

During the past year work at a senior level, has continued on the successful achievement of accreditation to and compliance with the NHS Labour Standards Assurance Scheme (level 2). This included the publication by Clinimed of a Labour Standards Policy, and risk assessment of certain of Clinimed's suppliers and their critical sub-contractors, as well as updating our Supply Agreements. We shall continue to monitor compliance with this standard, work to the recommendations of our auditor and consider rolling out the standard's processes to suppliers to the wider Clinimed Group, who will be carefully selected according to perceived risk.

Hydrokem, the newest member of the Clinimed Group, is a member of Sedex. Sedex is one of the world's leading ethical trade service providers, which works to improve working conditions in global supply chains. As such, a Sedex members' ethical trade audit is carried out by an independent auditor on a regular basis, and we ensure that any corrective actions are taken promptly if issues are brought to our attention. The last such audit took place in July 2019.

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.

FURTHER STEPS

We shall continue to review compliance throughout the coming year, and this statement will be refined and updated in the future.

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 2019. It has been approved by the Board of Directors of Clinimed (Holdings) Limited.



Nigel D Piercey,
Group Chairman,
Clinimed Group of Companies
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