

Modern Slavery Policy

MMM Medical Equipment UK Ltd

Introduction

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.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers in conjunction with the Modern Slavery Act 2015. MMM Medical Equipment UK Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

We expect that our suppliers will hold their own suppliers to the same high standards. Commitments Modern Slavery and Human Trafficking Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labor, bonded and child labor and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights. Commitments We shall be a company that expects everyone to work with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labor in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk-based approach we may require:
- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct

- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

Organisational structure

We are a provider of a full portfolio of products and services pertaining to sterilization and disinfection systems for hospitals, scientific institutes, laboratories and the pharmaceutical industry, MMM has positioned itself as a crucial quality driver and innovator on the UK and international markets

The commitment we make as a company ensures that all employees are financially sound with salaries across all levels are above the living wage, which we believe is a key component to an employee's wellbeing. By having the adaptability to work full or part time at home, in the office or out in the field, taking each individual's circumstance into account allows flexibility, emphasises our trust of our employees, encouraging individual autonomy and this is reflected in our employee retention rates with over 75% of employees with a minimum of 5-year service and 50% of employees over 10 years' service.

Our supply chains

We incorporate 4 key areas within our supply chain procedures:

Approving strategic suppliers

Strategic suppliers of products and services for use in installation, commissioning, validation and servicing of autoclaves, sterilizers, instrument washers, endoscope pre-processors and steam generators, will be purchased from suppliers on the List of Approved Suppliers. The List of Approved Suppliers is maintained within ProActive process records.

Initial qualification of strategic suppliers

Potential new strategic suppliers will be visited by the MMM management representative to determine if the supplier or service provider is capable of providing quality assured products and services. Following the visit, a report covering all critical aspects of the supplier or service provider's capability will be produced, depending on findings the supplier may be elevated to post qualification status.

Strategic Supplier – Initial approval status

Post qualified suppliers to the business are considered to have fully qualified for approved supplier list following:

- ✓ Two consecutive product or service deliveries without incident, or non-conformance entry to the company's ProActive action log.

Tactical suppliers

Tactical supplies are considered to have a low impact on the company's business process in the main consisting of consumables and products easily available from multiple sources. Approved supplier list inclusion is at the management representative discretion.

Effectiveness and performance indicators

- We measure the success and continual improvement of our efforts in combatting modern slavery and human trafficking by a number of key performance indicators, as follows:
- The number of risk assessments undertaken which indicate a risk of modern slavery, with outcomes formally captured at our monthly Risk Governance Committee
- Logging and monitoring the number of suppliers we have for each product and service we offer, in order to continually understand our supply chain risks
- Logging and monitoring the number of formal accreditations obtained by our suppliers which are of relevance to combatting modern slavery
- Logging, monitoring and escalating any suspected instances of modern slavery (including through our whistleblowing and speak up processes)
- External assurance from industry experts, as required
- Benchmarking and collaboration with wider industry experts, competitors and trade associations

Our 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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery and Human Trafficking policy.

Our Modern Slavery and Human Trafficking Policy demonstrate 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.

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 provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

John Darroch



Managing Director

MMM Medical Equipment UK Ltd

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