

Modern Slavery & Labour Standards Assurance Policy

Modern Slavery Act (2015) Statement

The United Kingdom (UK) Modern Slavery Act of 2015 requires businesses to provide a statement pertaining to their efforts to eradicate slavery and human trafficking from supply chains. This document constitutes Kebomed UK's policy statement.

About Kebomed UK

Kebomed UK Ltd is a leading independent distributor of medical devices, with a primary focus in minimal Invasive Gynaecology, Urology and General Surgery.

AIM

Kebomed UK Ltd recognises we have a responsibility to our employees & customers to ensure we have a clear Modern Slavery & Labour Standards Assurance Policy.

Kebomed UK's Management defines this policy as relevant to the organisation itself, its global suppliers and other parties engaged through the whole supply chain.

This policy is to comply with international law, and to this end, has identified the following reasons to implement Modern Slavery & Minimum Labour Standards to guide it in its business operations.

1. Ethical Reasonability – Kebomed UK acknowledges its obligations towards its customers, employees & suppliers in which it works arising from its business operations and wishes to work and trade in an ethical fashion.

2. To comply with the UK Modern Slavery Act of 2015

3. Threat to Security of Supply – Kebomed UK has identified that labour standards abuse in supply chains can pose a risk to the security of supply. Any supply chain partners found to be abusing the labour laws face legal enforcement action which may damage business and interfere with their ability to continue to supply.

4. Reduced Quality of Goods and Services – Kebomed UK recognises that there is commonly a link between poor labour standards and poor quality of goods and services. To this end, it is in the interest of Kebomed UK to ensure its suppliers reach minimum labour standards targets at all times.

5. Adverse Publicity and Damage to the Companies Reputation – adverse publicity from the discovery of labour standards abuses in the Company's supply chain presents reputational and structural risks as follows:

- Income – customers may choose to purchase supplies from other suppliers.
- Staff recruitment and retention – staff may choose not to work for a Company associated with any labour standards abuses and this may lead to poor morale in the workplace and difficulty in recruitment.
- loss of trust – both with customers and suppliers and within the wider community.

Minimum labour standards: -

1. **Child labour** – Kebomed UK does not support the use of child labour.
 - No person is employed who is below the minimum legal age for employment.
2. **Forced Labour**– Kebomed UK does not support or tolerate forced or bonded labour including forced prison labour.
 - Kebomed complies with the Modern Slavery Act 2015.
 - Forced, bonded or compulsory labour is not used, and employees are free to leave their employment after reasonable notice.
 - Employees are not required to lodge deposits of money or identity papers with their employer.
3. **Health and Safety** - Kebomed UK provides a safe and healthy working environment, in line with our health and safety policy. All suppliers, consultants and Sub-Contractors must also run a health and safety policy ensuring employees but not limited to: -
 - A healthy and safe working environment is provided for employees, in accordance with international standards and national laws. This includes access to clean toilet facilities, drinkable water and, if applicable, sanitary facilities for food storage.
 - When providing accommodation, it shall be clean, safe, and meet the basic needs of employees.
 - Appropriate health and safety information and training is provided to employees and a comprehensive health and safety policy is in place.
4. **Freedom of Association**
 - As far as any relevant laws allow, all employees are free to join or not to join trade unions or similar external representative organisations.
5. **Discrimination** – Kebomed UK does not support any discriminating practices. Kebomed UK has an Equal opportunities Policy which is shown to all new employees at induction.
 - No discrimination in hiring, remuneration, access to training, promotion, termination, or retirement based on race, national or social origin, class, religion, gender, sexual orientation, political belief, age, or other conditions that could give rise to discrimination.
6. **Remuneration** – Kebomed UK complies with the national laws in the UK.
 - All employers are to abide by their local and national labour laws in respect of employees' wages.
7. **Working Hours** – Kebomed UK complies with the applicable laws on working hours and holiday entitlement.
 - All employers are to abide by their local and national labour laws in respect of working hours and holiday entitlement.
8. **Disciplinary Practices**
 - All employees are to be treated with dignity and respect.
 - Shall not engage in or tolerate the use of corporal punishment, mental or physical force or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

Kebomed UK Ltd commits to: -

- Ensuring that our whole global supply chain, have responsible labour and health and safety practices. We will only work with licensees, suppliers, sub-contractors, and factories who take this responsibility as seriously as we do and adhere to the International Labour Organisations standards.
- Risk assesses all suppliers annually.
- Ensure that all suppliers and subcontractors have the correct certification for the products that they produce.
- Compliance to these standards is checked once every 12 months using the Supplier Yearly Questionnaire.
- Ensuring all employees, suppliers, consultants, and Sub-Contractors are aware of this policy.
- Making available sufficient resources to implement this policy as appropriate to the nature and scale of its operations.
- Kebomed UK acknowledges its obligations towards its customers, employees, and the communities in which it works. Therefore, adequate, and sufficient resources will be made available.
- Review this policy regularly to ensure continual improvements.
- We will provide training and awareness programs for all our employees, contractors, and suppliers to ensure they understand the importance of preventing Modern Slavery and forced labour.
- Communicate this policy to our stakeholders and the public through our website, social media, and other channels.
- Encourage anyone who suspects any violations of this policy to report it to their supervisor, HR department, or a designated representative. We will take all reports seriously and investigate any alleged violations promptly and thoroughly. We will also take appropriate action to address any confirmed violations, which may include termination of employment or business relationships.
- To have Senior Managements involvement through the implementation, review, and improvement process.

Kebomed UK Senior Management team have defined this policy as relevant to the organisation itself, its contractors, sub-contractors, suppliers, and other parties engaged through the supply chain.

Gordon Laws

Gordon Laws
Managing Director

Action / activities taken.

Pre 2023

Standard Modern slavery statement on website stating KUK does not have an annual turnover above £36m, so therefore is not required under this legislation to produce a yearly statement

<https://www.kebomed.co.uk/about/>

All suppliers are sent an annual questionnaire, to confirm all regulatory aspects in place and evidence sent.

Actions taken in the last 12 months - 2023.

Kebomed UK has produced: -

- Detailed Modern Slavery Policy
- Modern slavery and Labour standard review statement / procedure
- Labour standard questionnaire
- Modern Slavery Risk assessment process
- Modern Slavery Risk Management and Opportunities for improvement
- Supplier evidence list
- Policy has been sent to all Suppliers and Employees

Actions to be undertaken in the next 12 months - 2024.

- Collate all signed policies from suppliers.
- Risk assessment of each supplier
- Review each supplier with leadership team.
- Follow up on any actions needed.
- Training programme of team.
- To continue to re-assess the risks posed to the business in connection with the Act.
- To review and monitor developments and proposed changes to the Act in accordance with the businesses' compliance programme.

Approval by KUK Leadership Team

The Kebomed UK leadership team has approved this statement. 29th December 2023

Revision History

Date	Change	Carried out by
29/12/2023	Addition of Action / activities taken section	Kate Dominy

