

Document Number:	STMT-LA-01	Document Title:	Modern slavery and human trafficking statement 2022 to 2023				
Revision Author:	Carr, Natalie Jane	Date Published:	14/09/2022	Revision Number:	0	Status:	Active

Modern slavery and human trafficking statement 2022 to 2023

At Salts Healthcare we:

- act ethically and with integrity in all our business relationships,
- implement and enforce effective systems and controls to prevent acts of modern slavery and human trafficking from occurring within the business and supply chain, and
- ensure there is transparency in the business and in Salts Healthcare's approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act.

This policy outlines the steps Salts Healthcare has taken and continues to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

Company Overview

Salts Healthcare has been in operation since the early 1700's, pioneering and manufacturing products that have shaped the medical industry. A family run business that began with the making of surgical instruments and artificial limbs for injured soldiers. Salts Healthcare has grown significantly since these earlier days, continuing manufacture in the niche sector of stoma devices.

In addition to the manufacturing of these products, Salts Healthcare provides the following services:

- Country-wide Customer Dispensing Centres which facilitate the operational and customer service elements of this area of the business, dispensing all FPI0 listed stoma appliances in line with current pharmaceutical regulations.
- Established 'Medilink Home Delivery Service' which supplies stoma patients with their personalised prescriptions.
- Salts Healthcare Medilink Stoma Care Nurse Team, consisting of specialist nurses working across the country, continually providing bespoke care and support to stoma patients in their own home or through community-based clinics.
- Salts Healthcare do not just meet the needs of stoma patients here in the UK, but distribute globally, with a presence in 23 worldwide countries.

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Our commitment to the principles of the Modern Slavery Act 2015

Salts Healthcare is committed to the principles of the Modern Slavery Act 2015.

Salts Healthcare is an equal opportunities employer, who are committed to ensuring a non-discriminatory and respectful working environment for all of our staff.

Our recruitment personnel management processes are designed to ensure that all prospective personnel are legally entitled to work in the UK and to safeguard personnel from any abuse or coercion.

At Salts Healthcare, we ensure that we do not enter into business with any organisation globally which knowingly or is found to contravene the principles of the Modern Slavery Act 2015.

Our Supply Chain

Salts Healthcare's supply chain comprises of the following:

- Suppliers of raw materials
- Suppliers of component parts
- Suppliers of Salts Branded Finished Products
- Suppliers of Competitor Finished Products
- Service Providers for delivery: PGS Global, APC etc

At Salts Healthcare, we perform the following due diligence activities to ensure that our supply chain complies with the principles of the Modern Slavery Act 2015:

- review supplier relationships to confirm their compliance and continued adherence to the principles of the Modern Slavery Act.
- evaluate supplier proposals by including consideration of modern slavery points in the supplier selection process.
- ask all of our Distribution Partners to agree to comply with our compliance code of conduct.
- ask all of our Distribution Partners to complete annual compliance training.

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- carry out company and supplier audits, assess any instances of non-compliance and tailor remedial action appropriately, specifically by including this in our quality system review meetings.
- Risk Assessments may be carried out where concerns have been identified from the self-declaration's suppliers will complete. If such a situation arises; a relationship with potential suppliers will only be sought once a satisfactory risk assessment has been completed.
- ensure that our policies appropriately document our approach to the issues of modern slavery and human trafficking, including a review to ensure that the process of reporting concerns is clear and effective.

Counteractive Measures

Whistle Blowing:

Our Whistleblowing Policy allows employees to report concerns around workplace practices without fear of reprisal and with confidence that the matter will be taken seriously and investigated appropriately. There are no restrictions on the subject matter of the issue in hand and therefore includes any concerns around slavery or human trafficking that an employee may have.

Anti-Bribery and Corruption Training

Our personnel handbook contains an Anti-Bribery Policy that all personnel are issued with as part of their induction. Training on anti-bribery and corruption is given to all relevant employees. This ensures all employees whose job role may be susceptible to bribes or corruption are fully informed of what this could look like and how to respond lawfully. This training increases staff awareness and knowledge on the subject matter, whilst preventing the possibility of such instances taking place.

Modern Slavery Training

Training provisions are in place for relevant members of staff managing supply chain and personnel. Modern Slavery related training will also be delivered to the Company Board and senior management staff as a part of Employee Handbook update presentations during 2022. Senior management staff are responsible for broader awareness-raising within specific departments.

Recruitment and Selection:

Our Human Resources Department are responsible for overseeing recruitment within the Company. All Human Resource personnel are fully trained and qualified to ensure that safe and ethical recruitment is carried out at all times. Thorough and robust

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employment checks conducted prior to commencement of employment ensures good recruitment practices are maintained at all times; minimising any risk of unethical employment or negligence relating to slavery or human trafficking.

Use of temporary workers sourced through an employment agency:

At Salts Healthcare, we ensure we use reputable employment agencies to source labour and seek specific information from the agencies before accepting their personnel. Salts Healthcare ensures that agencies used comply with the National Minimum Wage and meet Pay Parity requirements.

Policies in relation to the Modern Slavery Act 2015

The following policies are available to all personnel:

- Whistleblowing Policy
- Anti-Bribery Policy
- QP 06 Purchasing and Supplier Assessment Procedure
- Recruitment Policy
- Grievance Procedure
- Dignity at Work and Equal Opportunities Policy

This statement will be reviewed and updated every year.

Approval by Board of Directors using their electronic signature; within the Q-Pulse system	
Ian Taylor	Finance Director
Robert Salt	Managing Director
Peter Salt	Chief Executive