



Modern Slavery Statement

Version: 1

[Updated August 2023 by John Shepherd]

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Modern Slavery Statement



The Modern Slavery Act 2015 requires large organisations operating in the UK to publish an annual statement setting out the steps they have taken to ensure modern slavery does not exist in their business and supply chains. Modern slavery is a term used to include acts such as slavery, servitude, forced or compulsory labour, child labour, and human trafficking.

Organisational Structure

This policy applies to Repton Medical Ltd and any companies that are owned by Repton Medical Ltd. When we refer to 'Repton' or 'Repton Medical' we are referring to each individual Repton Medical company, or the Repton Medical group of companies as a whole, as the context requires. Repton Medical is a UK headquartered, privately owned business founded in 2003 which primarily focuses on the distribution of Patient Safety medical products to the UK market, which includes hospitals and healthcare markets. Repton Medical operates from a single location in the UK.

Ethical Policy Ethos

Repton Medical welcome the Modern Slavery Act and are committed to its aims of eradicating modern slavery. Repton Medical, through its actions, as outlined in this statement and its supporting Business Ethics Policy, coupled with its supporting systems and practices, will review and work with our suppliers and distribution partners to ensure adherence to the aims and objectives of its Business Ethics Policy and to pay its part in eradicating all forms of modern slavery.

Supply Chain

Repton Medical works with a range of suppliers, in various countries across the world. Some of our suppliers are located in countries that are deemed a higher risk of modern slavery occurring. Our policies and procedures reflect the diversity of suppliers Repton Medical uses.

We have two levels of suppliers; those that are strategic to our business and those with whom we work on an ad-hoc basis. Given the different nature of these suppliers, our processes for each are different, as outlined below.

Strategic Suppliers

Repton has always and continues to monitor the business practices and operations of its key strategic suppliers by way of the following practices:

- Visits to their premises and operations locations to get a first-hand perspective on their business practices;
- Audits to ensure suppliers are complying with their obligations to Repton Medical, and in law

Once we have conducted our due diligence on a new strategic supplier, we then ensure all suppliers are issued with our standard supplier agreement. This agreement is regularly reviewed by our external legal advisors to ensure it is up to date with current best practice and complies with all relevant legal obligations. Our standard supply agreement contains binding obligations on the strategic suppliers to:

- Grant us access to their facilities to audit their practices;
- Take steps to eradicate modern slavery within their business; and
- Hold their own suppliers to account over modern slavery.

In addition to the above, any breach of these obligations gives Repton Medical the right to terminate the contract with immediate effect.

Ad-hoc Suppliers

We reserve the right to request visits to their premises and operations, as with our strategic suppliers. We do not require them to enter into our supplier agreement but do make purchases subject to our standard terms and conditions of purchase. These standard terms of purchase include obligations on ad-hoc suppliers to comply with Repton Medical's mandatory policies, including our anti-slavery policy.

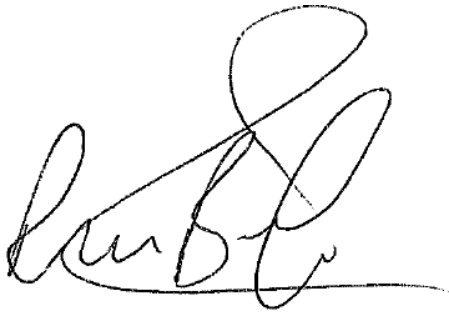
Conclusion

By following the processes outlined above, and undertaking the due diligence Repton Medical undertakes, Repton Medical are at low risk of modern slavery occurring within our supply chain.

Training & Awareness

Repton Medical provide training and awareness of Repton's Ethics Policy and this statement through the new employee induction process. In addition, all relevant Managers and departments plus all Executive Board Directors have completed training for the Modern Slavery Act.

This statement has been approved by the Directors and is signed by Richard Burton, Managing Director, who has overall responsibility for Repton Medical Ltd.

A handwritten signature in black ink, appearing to read 'R Burton', with a large loop at the top and a horizontal line at the bottom.

Last updated August 2023