

Modern Slavery Awareness and Practices Training Document

For Viamed Ltd Staff

Introduction to Modern Slavery

Definition: Modern slavery encompasses severe forms of exploitation, including forced labour, debt bondage, human trafficking, and other slavery-like practices. It can occur in every industry and sector, affecting millions of people worldwide.

Relevance to Our Business: As a supplier to the NHS, and the medical equipment market as a whole, we have a responsibility to ensure our supply chain is free from modern slavery practices. This is not only a legal and ethical obligation but also a commitment to uphold human rights and dignity.

Understanding the Tiers in Our Supply Chain

Tier 1: Direct Suppliers

- **Overview:** Suppliers we have a direct relationship with. These are our immediate suppliers of goods or services.
- **Our Approach:** In the next very near future, we will start contacting our suppliers to request their Modern Slavery policies, ensuring they align with our commitment to ethical practices. This initiative is part of our broader effort to conduct due diligence on our supply chains, focusing on:
- Engaging with our suppliers to confirm their adherence to ethical labour practices and compliance with applicable laws regarding modern slavery and human trafficking.
- Implementing a supplier approval process that considers their commitment to human rights and anti-slavery initiatives.

Tier 2: Indirect Suppliers

- **Overview:** Suppliers that provide materials or components to our Tier 1 suppliers.
- **Our Approach:** In the future we will extend our due diligence processes to key Tier 2 suppliers through requirements placed on our Tier 1 suppliers, encouraging responsible management of their supply chains.

Tier 3 and Beyond: Raw Material Providers and Further Downstream Suppliers

- **Overview:** This includes suppliers of raw materials and other inputs used further down our supply chain.
- **Our Approach:** We will support initiatives and participate in industry collaborations aimed at improving labour standards and practices at these more removed tiers.

What we can do - Regular Monitoring and Assessment

Conduct Regular Assessments: We will train those staff purchasing goods on how to conduct regular risk assessments of suppliers, including audits, surveys, and site visits if needed or possible. Emphasising the importance of evaluating not just direct suppliers but also deeper tiers.

Building Relationships

Encourage Direct Communication: We are fostering an environment where purchasing staff feel comfortable directly communicating with suppliers to ask questions and express concerns. We want to build strong relationships with suppliers which can lead to more transparency and cooperation.

Reporting and Escalation

Clear Reporting Mechanisms: We want to ensure that there are clear mechanisms in place for staff to report potential risks or unethical practices they identify. Our internal Intrastat system can be used to send issues alerting us to any concerns staff may have.

Identifying Risks of Modern Slavery

Key indicators of modern slavery within a business context - Warning Signs from Suppliers

Warning Signs at Different Tiers:

Tier 1 Suppliers:

- Lack of transparency or unwillingness to share detailed information about manufacturing processes and labour practices.
- Reports of unethical practices, such as poor working conditions, in media or industry audits.
- Inconsistencies in documentation, such as records of working hours and wages.

Tier 2 and Beyond:

- Difficulty in tracing the origin of raw materials or components, suggesting a lack of oversight.
- Use of subcontractors without prior notification or approval, which may indicate an attempt to obscure labour practices.
- Significant discrepancies in product quality or delivery times, which can signal issues in the production process or labour shortages.
- How to spot potential risks in our supply chain, including warning signs from suppliers at different tiers.
- The importance of vigilance and reporting any concerns through our internal Intrastats reporting mechanism.

The International Labour Organisation's (ILO) - 11 Indicators of Forced Labour

Understanding these indicators can help staff identify circumstances where forced labour may be present within our supply chain. Below is a detailed explanation of each indicator to enhance your ability to recognise forced labour situations:

1. Abuse of Vulnerability

This involves exploiting a person's vulnerable position (due to their legal status, economic condition, lack of knowledge, or other factors) to force them into work. Workers may feel they have no choice but to accept or continue employment due to these vulnerabilities.

2. Deception

Workers are often misled about the nature and conditions of their work, the compensation they will receive, or the location of their employment. This can include false promises that are materially different from their actual working conditions.

3. Restriction of Movement

This occurs when employers use measures to control the movement of workers, preventing them from leaving their place of work. This can be through physical confinement in the workplace or living quarters, or through more subtle means like surveillance or threats.

4. Isolation

Workers are isolated to limit their contact with the outside world, making it difficult for them to seek help or escape abusive situations. This can be physical isolation (remote locations) or social isolation (restricting communication).

5. Physical and Sexual Violence

The use or threat of physical violence and sexual abuse to force individuals to work or to punish them for not complying with demands. This creates an environment of fear and compliance.

6. Intimidation and Threats

Employers or recruiters may use threats of violence, deportation, or other harmful consequences against the worker or their family members to enforce compliance.

7. Retention of Identity Documents

Employers unlawfully holding onto workers' passports, identification cards, or other important documents to prevent them from leaving the job.

8. Withholding of Wages

Employers do not pay the workers as promised, pay them less than agreed, or use illegal deductions as a method to keep workers in a state of dependency.

9. Debt Bondage

Workers are forced to work to repay a debt or loan, and the terms of this debt are often unclear or change at the discretion of the employer. Often, the debt accumulates faster than it can be paid off, creating a cycle of debt and forced labour.

10. Abusive Working and Living Conditions

Workers are subjected to conditions that violate their rights and dignity, such as unsafe working environments, overcrowded and unsanitary living quarters, or being denied adequate food and water.

11. Excessive Overtime

Workers are forced to work significantly beyond normal hours and days, with no option to refuse or escape these conditions, often under threat of penalty or dismissal.

We want to educate our staff on these indicators so as to equip them with the knowledge to spot red flags in your operations or supply chain. It is crucial to implement reporting mechanisms and investigate any reports of these practices immediately. Addressing forced labour not only requires vigilance but also a commitment to taking corrective action to protect and support affected workers.

Reporting Concerns

- Our internal issue and reporting system, Intrastats is to be used to report any concerns that staff may have.
- We will always give an assurance of confidentiality and protection for those who report concerns.
- We highly value the role of our internal reporting mechanism in combating modern slavery.

Our Commitment to Training and Awareness

- Ongoing training opportunities when requested, for staff to stay informed about modern slavery issues.
- Resources available for further education on modern slavery and human trafficking.

Conclusion and Our Collective Responsibility

- The importance of everyone's role in identifying and preventing modern slavery.
- Encouragement for all staff to take an active part in our efforts to ensure an ethical supply chain.
- Commitment from Viamed Ltd to review and improve our practices continually.

Resources for Further Learning

If you want to learn more about modern slavery and how it can empower you to recognise and respond to these issues effectively. Below is a list of reputable resources and organisations that offer in-depth information, research, and tools related to modern slavery:

1. International Labour Organization (ILO)

Resource: Various publications, statistics, and tools on forced labor, child labor, and human trafficking.

Website: ilo.org

2. Walk Free Foundation

Resource: The Global Slavery Index offers country-by-country rankings on the number of people living in conditions of modern slavery.

Website: globalslaveryindex.org

3. Anti-Slavery International

Resource: Information on different types of modern slavery, personal stories, and ways to get involved in the fight against slavery.

Website: antislavery.org

4. United Nations Global Initiative to Fight Human Trafficking (UN.GIFT)

Resource: Resources, reports, and the Vienna Forum to Fight Human Trafficking proceedings, highlighting global efforts against human trafficking.

Website: ungift.org

5. Polaris Project

Resource: Detailed information on human trafficking and modern slavery, focusing on the U.S., with data, reports, and resources for victims.

Website: polarisproject.org

6. Freedom Fund

Resource: Research and insights on tackling modern slavery, with a focus on the most affected regions and sectors.

Website: freedomfund.org

7. Business & Human Rights Resource Centre

Resource: A rich repository of information related to business impacts on human rights, including labor rights violations and modern slavery in supply chains.

Website: business-humanrights.org

8. Ethical Trading Initiative (ETI)

Resource: Best practices, guidelines, and training resources for companies committed to ethical trading and the eradication of exploitation in their supply chains.

Website: ethicaltrade.org

9. Supply Chain School

Resource: Offers resources and learning materials specifically focused on sustainability and ethical practices within supply chains.

Website: supplychainschool.org

10. KnowTheChain

Resource: Provides benchmarks of large global companies on their efforts to address forced labor, offering insights into best practices.

Website: knowthechain.org