

Vandagraph Sensor Technologies Ltd Modern Slavery Statement

For the Financial Year Ending 2024

At Vandagraph Sensor Technologies Ltd, we are committed to conducting our business responsibly and to maintaining high ethical standards in all our operations, including our supply chains. We recognise the importance of combating modern slavery and human trafficking and are committed to improving our practices to combat slavery and human trafficking in our corporate activities and supply chains.

Our Business and Supply Chains

Vandagraph Sensor Technologies Ltd is a supplier of medical equipment including oxygen monitoring, sensors and equipment to the NHS, local, national and international companies and end users. We source our products from a range of suppliers, both domestically and internationally, and are dedicated to ensuring that high standards of ethical conduct are maintained throughout our supply chain.

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. Our Anti-Slavery Policy reflects our promise to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes

In the next 12 months, 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.

Training

We will begin to train our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business. Our training will focus on identifying and preventing modern slavery and ensuring our employees are aware and vigilant.

Reporting Mechanisms

Vandagraph Sensor Technologies Ltd already has an internal reporting mechanism in place for ethical concerns. We will inform our staff about the importance of using this mechanism to report any suspicions of modern slavery or unethical practices within our operations or supply chain. This reporting mechanism is a vital part of our commitment to transparency and accountability.

Commitment to Ethical Practices and Workers' Rights

Vandagraph Sensor Technologies Ltd is dedicated to upholding the highest standards of ethical conduct and compliance with both local and national laws in all areas of our operations. Our commitment extends beyond our direct activities to encompass our entire supply chain, reflecting our dedication to the protection and promotion of human rights and labour standards. In line with this commitment, we ensure the following provisions are adhered to throughout our supply chains:

- **Adherence to Local and National Laws:** All our operations and supply chain activities strictly comply with the legal standards and regulations of the countries in which we operate. This commitment ensures that our business practices are lawful, ethical, and responsible.
- **Freedom of Workers to Terminate Employment:** We uphold the right of all workers to terminate their employment freely, without facing unreasonable penalties or restrictions. This principle is a fundamental aspect of respecting worker autonomy and preventing involuntary labour.
- **Freedom of Movement:** Our company and our suppliers ensure that workers' freedom of movement is not unlawfully restricted. Workers should have the freedom to move freely within their workplace and their living environment.
- **Freedom of Association:** We support the right of workers to freely associate, organize, and bargain collectively in a lawful and peaceful manner. This includes respecting the formation and operation of worker unions or other representative bodies.
- **Prohibition of Threats of Violence, Harassment, and Intimidation:** Our company culture and supply chain operations are free from any threats of violence, harassment, and intimidation. We are committed to providing a safe and respectful work environment for all.
- **Prohibition of Worker-Paid Recruitment Fees:** We ensure that our recruitment practices are ethical and fair, prohibiting the use of worker-paid recruitment fees. This policy helps prevent debt bondage and other forms of modern slavery.
- **Prohibition of Compulsory Overtime:** We ensure that all overtime work is voluntary and compensated according to applicable laws and regulations, respecting workers' rights to rest and personal time.
- **Prohibition of Child Labour:** Our operations and supply chains are free from child labour. We adhere to the minimum age provisions of national laws and regulations and support the rights of children to education and development.
- **Prohibition of Discrimination:** We are committed to creating a workplace and supply chain that is free from discrimination based on race, colour, sex, religion, political opinion, nationality, social origin, or any other status.
- **Prohibition of Confiscation of Workers' Original Identification Documents:** We ensure that workers retain personal control over their identification documents to prevent coercion and involuntary servitude.

- **Access to Remedy, Compensation, and Justice for Victims of Modern Slavery:** We are committed to providing access to remedy and justice for individuals who have been victims of modern slavery, including appropriate compensation and support services.

By incorporating these provisions into our business practices and supply chain management, Vandagraph Sensor Technologies Ltd demonstrates our unwavering commitment to respecting human rights, labour standards, and ethical business conduct. We recognize that our responsibility extends beyond compliance to active engagement in promoting dignity, safety, and well-being for all individuals involved in our operations and supply chains.

Responding to Reports of Suspected Modern Slavery in the Supply Chain

At Vandagraph Sensor Technologies Ltd, we take all reports of suspected modern slavery within our supply chain very seriously. Our commitment to ethical business practices and human rights necessitates a proactive and comprehensive approach to investigate and address any allegations or evidence of such practices. Here is our procedure for responding to these reports:

Immediate Action

Upon receiving a report of suspected modern slavery, we will:

- **Acknowledge receipt** of the report to the reporter, ensuring confidentiality and protection from retaliation.
- **Conduct an initial assessment** to determine the credibility and urgency of the report. This assessment will guide our next steps, including the scope and scale of the investigation.

Investigation

- **Assign a dedicated team** to lead the investigation, which may include internal staff and, if necessary, external experts with experience in modern slavery and supply chain audits.
- **Gather and review information** by working closely with the implicated supplier(s) to understand the situation, while ensuring that any investigation does not further endanger the rights or safety of workers.
- **Document findings** thoroughly, maintaining confidentiality and impartiality throughout the process.

Taking Action

- **Implement corrective actions** based on the investigation's findings. This may include working with the supplier to rectify the issues, providing support for victims, and, if necessary, reevaluating or terminating our relationship with the supplier.
- **Prevent recurrence** by identifying root causes and implementing measures to prevent similar issues in the future. This may involve revising our supplier selection and evaluation processes, enhancing training for staff and suppliers, or increasing the frequency of audits.

Transparency and Reporting

- **Communicate findings** and actions taken to relevant stakeholders, including the initial reporter, while respecting the confidentiality and safety of all parties involved.
- **Update our policies and procedures** as necessary to reflect lessons learned and improve our ability to identify and respond to modern slavery risks.

Support and Remediation

- **Provide access to remedy** for victims, which could include financial compensation, support services, or assistance in finding alternative employment.
- **Collaborate with NGOs, government bodies, and other organizations** to support victims and improve standards across the industry.

Our approach to responding to reports of suspected modern slavery is rooted in transparency, accountability, and a commitment to the dignity and rights of all workers in our supply chain. Vandagraph Sensor Technologies Ltd is dedicated to continuous improvement and encourages all employees, suppliers, and stakeholders to report any concerns or suspicions of modern slavery practices.

Annual Review

We commit to reviewing our Modern Slavery Policy and practices annually to ensure they remain effective and responsive to the risks of modern slavery and human trafficking in our supply chains. This will include checking with our suppliers annually to ensure there have not been any changes in their practices that would affect their compliance with our ethical standards.

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2024. This statement has been approved by the board of directors of Vandagraph Sensor Technologies Ltd and is signed by:



Derek Lamb, Managing Director

27th February 2024