

Viamed Ltd

Modern Slavery Prevention and Due Diligence Procedure

Version: 1.0

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Review Period: Annual

Document Owner: Managing Director

Approved By: Managing Director

1. Purpose

The purpose of this procedure is to define the systematic approach adopted by Viamed Ltd to prevent, identify, assess, monitor and mitigate the risks of modern slavery and human trafficking within its own operations and throughout its supply chain.

This procedure supports compliance with:

- Modern Slavery Act 2015
- Health and Care Act 2022
- NHS Supplier Requirements
- ISO 13485 Quality Management System
- ISO 9001 principles adopted across the wider group

The procedure establishes a proportionate, risk-based due diligence process appropriate to the size, nature and complexity of Viamed Ltd's operations and demonstrates continual improvement through annual review.

2. Scope

This procedure applies to:

- all employees;
- directors;
- temporary workers;
- purchasing activities;

- supplier approval;
- supplier monitoring;
- outsourced activities;
- manufacturers;
- distributors;
- contractors providing goods or services to Viamed Ltd.

The procedure applies throughout the supplier lifecycle from supplier selection through to ongoing supplier review and contract management.

Supplier Identified



Initial Risk Assessment



Supplier Due Diligence



Supplier Approval



Annual Supplier Review



Management Review



Continual Improvement

3. Policy Statement

Viamed Ltd operates a zero-tolerance approach towards slavery, servitude, forced labour, compulsory labour and human trafficking.

The company is committed to:

- conducting business ethically;
- respecting internationally recognised human rights;

- maintaining responsible purchasing practices;
- promoting ethical supply chains;
- undertaking proportionate due diligence;
- working collaboratively with suppliers to improve standards where appropriate.

Viamed Ltd recognises that modern slavery risks cannot be eliminated entirely but can be effectively managed through continual assessment, supplier engagement and improvement.

4. Responsibilities

Managing Director

The Managing Director has overall responsibility for:

- approving this procedure;
- approving the Modern Slavery Statement;
- ensuring adequate resources are available;
- reviewing KPIs;
- reviewing supplier risks;
- approving escalation decisions;
- chairing the annual management review.

Senior Management

Responsible for:

- reviewing annual KPIs
- approving continual improvement actions
- ensuring sufficient resources
- reviewing legislative changes

Purchasing

Purchasing personnel are responsible for:

- supplier approval;
- supplier due diligence;
- obtaining supplier declarations;

- annual supplier reviews;
- identifying potential risks;
- escalating concerns.

Employees

All employees are responsible for:

- completing required awareness training;
 - remaining vigilant for indicators of modern slavery;
 - reporting concerns immediately through Intrastats or management.
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5. Risk-Based Approach

Viamed Ltd adopts a proportionate risk-based approach.

Risk assessments consider:

- supplier location;
- manufacturing location;
- country risk;
- sector risk;
- labour intensity;
- outsourced processes;
- previous supplier performance;
- ethical certifications;
- supplier transparency.

Higher-risk suppliers receive additional scrutiny and engagement.

Risk classifications may be revised following supplier reviews, changes in sourcing arrangements, reported concerns or changes in country or sector risk.

Risk assessments are reviewed annually or whenever significant changes occur.

Risk	Examples	Review Frequency
Low	UK suppliers, ISO certified, long-established	Annual
Medium	Overseas suppliers with limited information	Annual + additional monitoring

Risk	Examples	Review Frequency
High	High-risk countries, labour-intensive manufacturing, adverse reports	Immediate review and at least annually

6. Supplier Due Diligence

Supplier due diligence may include:

- supplier approval questionnaires;
- review of supplier certifications;
- review of Modern Slavery Statements;
- review of ethical policies;
- Supplier Code of Conduct acceptance;
- annual supplier review;
- review of publicly available information;
- assessment of country and sector risks.

Where appropriate, suppliers may be requested to provide additional evidence demonstrating compliance with modern slavery legislation.

Where evidence is considered insufficient, Viamed Ltd may undertake additional due diligence or increase the supplier's risk classification.

7. Supplier Approval and Monitoring

Approved suppliers are reviewed annually.

Higher-risk suppliers are reviewed:

- whenever concerns arise; and
- at least annually.

Supplier reviews consider:

- quality performance;
- delivery performance;

- ethical compliance;
- complaints;
- corrective actions;
- supplier declarations;
- modern slavery controls.

Supplier performance forms part of ongoing supplier approval.

8. Ethical Purchasing Practices

Viamed Ltd recognises that purchasing practices can influence labour conditions throughout supply chains.

The company therefore aims to:

- maintain fair pricing;
- avoid unreasonable lead times;
- avoid unrealistic delivery expectations;
- provide accurate specifications;
- maintain prompt payment practices;
- maintain constructive supplier relationships.

Purchasing decisions shall not knowingly create unreasonable pressure that may contribute to unethical labour practices.

9. Staff Awareness and Training

Relevant employees receive modern slavery awareness training.

Training includes:

- recognising warning signs;
- ILO Forced Labour Indicators;
- supplier risks;
- reporting procedures;
- responsibilities under this procedure.

Training records are maintained and reviewed annually.

10. Reporting Concerns

Any employee identifying concerns shall report them immediately.

Reports may be raised through:

- Intrastats;
- line management;
- senior management.

Reports are treated confidentially wherever possible.

Retaliation against employees raising genuine concerns will not be tolerated.

11. Investigation and Escalation

Where concerns are identified the following process shall be followed:

1. Concern recorded.
2. Initial risk assessment completed.
3. Supplier contacted where appropriate.
4. Evidence reviewed.
5. Corrective Action Plan requested where necessary.
6. Progress monitored.
7. Escalation to the Managing Director where risks remain.
8. Suspension or removal of supplier considered where unacceptable risks remain unresolved.

Where appropriate, Viamed Ltd will seek to work collaboratively with suppliers to improve standards before considering termination of supply arrangements.

12. Monitoring and Key Performance Indicators

Performance is monitored using measurable indicators including:

- suppliers reviewed;
- supplier engagement;
- supplier declarations received;
- Supplier Code of Conduct acknowledgements;
- staff training completion;

- reported concerns;
- corrective actions;
- supplier risk classifications.

KPIs are reviewed annually.

Measures of Success

The effectiveness of this procedure is assessed through the achievement of measurable objectives including:

- Completion of annual supplier reviews in accordance with the Supplier Review Programme.
- Completion of modern slavery awareness training for all relevant employees.
- Issue of the Supplier Code of Conduct to all new approved suppliers.
- Investigation and appropriate resolution of all reported concerns.
- Completion of the annual Management Review.
- Continuous improvement actions identified, implemented and monitored.

Performance against these measures is reviewed annually by senior management as part of the Management Review process.

13. Management Review

Modern slavery forms part of the annual Management Review process.

The review includes consideration of:

- supplier risk profile;
- supplier engagement;
- KPI performance;
- staff training;
- reported incidents;
- corrective actions;
- legislative changes;
- opportunities for continual improvement.

Actions arising from Management Review are recorded and monitored.

14. Records

Records maintained under this procedure include:

- Supplier Risk Register
- Supplier Reviews
- Supplier Engagement Log
- Modern Slavery Statement
- Supplier Code of Conduct
- Purchasing Practices and Ethical Sourcing Assessment
- Staff Training Records
- KPI Register
- Management Review Minutes
- Corrective Action Records

Records are retained in accordance with Viamed Ltd document control procedures.

15. Related Documents

This procedure forms part of the Viamed Ltd Management System and should be read alongside:

- Modern Slavery Statement
 - Supplier Code of Conduct
 - Purchasing Practices and Ethical Sourcing Risk Assessment
 - Supplier Approval Procedures
 - Staff Training Procedure
 - Management Review Procedure
 - Corrective Action Procedure
 - Document Control Procedure
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16. Continual Improvement

Viamed Ltd is committed to continually improving its approach to preventing modern slavery.

Improvement activities include:

- increasing supplier engagement;

- improving supply chain visibility;
- strengthening supplier due diligence;
- enhancing KPI monitoring;
- expanding supplier risk assessments;
- reviewing this procedure annually;
- monitoring changes in legislation and recognised best practice.

The effectiveness of this procedure shall be reviewed annually by senior management to ensure it remains appropriate, effective and proportionate.

17. Governance

This procedure forms part of the Viamed Ltd Management System.

Compliance with this procedure is monitored through:

- supplier approval activities;
- annual supplier reviews;
- KPI monitoring;
- internal reporting;
- Management Review; and
- continual improvement activities.

This procedure shall be reviewed at least annually, or sooner where legislative, organisational or operational changes require.

Appendix A

Modern Slavery Prevention and Due Diligence Procedure

- Modern Slavery Statement
- Supplier Code of Conduct
- Purchasing Practices Assessment
- Supplier Risk Register
- Supplier Engagement Log
- Supplier Reviews

- Staff Training
- KPI Register
- Management Review
- Corrective Actions