

Modern Slavery Internal Audit

Company	Viamed Ltd	Audit Title	Modern Slavery and Ethical Supply Chain Internal Audit
Audit Reference	_____	Audit Date	_____
Auditor	_____	Persons Interviewed	_____
Department/Process	Purchasing, Supplier Management, Human Resources and Compliance	Previous / Next Audit	_____/_____ _____

1. Audit Purpose

The purpose of this audit is to confirm that Viamed Ltd's modern slavery controls are documented, implemented, maintained and effective.

- Maintains suitable modern slavery and ethical sourcing policies.
- Identifies and evaluates modern slavery risks within its operations and supply chain.
- Communicates expectations to critical suppliers.
- Obtains and reviews appropriate supplier evidence.
- Provides relevant staff training.
- Maintains suitable reporting, investigation and escalation arrangements.
- Monitors performance and implements improvements.

2. Audit Scope

- Viamed Ltd's own operations.
- Purchasing and supplier approval processes.
- Critical and higher-risk Tier 1 suppliers.
- Known subcontractors, contract manufacturers and Tier 2 suppliers where information is available.
- Staff involved in purchasing, supplier management, quality, compliance and management review.
- Modern slavery incidents, concerns or supplier declarations received during the previous 12 months.

3. Audit Criteria and Reference Documents

- Viamed Ltd Modern Slavery Statement.
- Viamed Ltd Supplier Code of Conduct.
- Purchasing Practices and Ethical Sourcing Risk Assessment Statement.
- Anti-Bribery and Corruption Policy.
- Modern Slavery Awareness and Practices Training.
- Supplier review procedure and supplier review records.
- Modern Slavery Supplier Questionnaire.
- Whistleblowing or confidential reporting procedure.
- Relevant management review records.
- Previous Modern Slavery Assessment and improvement recommendations.
- Applicable supplier declarations, policies and supporting evidence.

4. Audit Rating

Each question should be rated as follows: Conforming – requirement is documented and operating effectively; Opportunity for Improvement – requirement is substantially met but could be strengthened; Minor Nonconformity – a control is incomplete, inconsistently applied or insufficiently evidenced; Major Nonconformity – a required control is absent, ineffective or a serious risk has not been addressed; Not Applicable – requirement does not apply, with the reason recorded.

Section A – Governance and Policy

A1. Modern Slavery Statement

Audit Question: Is there a current Modern Slavery Statement covering the latest reporting period?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

A2. Approval and Publication

Audit Question: Has the Modern Slavery Statement been:

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

A3. Policy Content

Audit Question: Do Viamed's policies clearly prohibit:

- Forced or compulsory labour?
- Human trafficking?
- Child labour?
- Worker-paid recruitment fees?
- Debt bondage?
- Retention of passports or original identity documents?
- Compulsory overtime?
- Threats, violence, harassment and intimidation?
- Discrimination?
- Restriction of movement?
- Retaliation against workers who raise concerns?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

A4. Responsibilities

Audit Question: Are responsibilities for modern slavery prevention, supplier review, incident investigation and corrective action clearly assigned?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

Section B – Supply Chain Mapping and Risk Assessment

B1. Tier 1 Supplier Mapping

Audit Question: Does Viamed maintain an up-to-date list of its critical Tier 1 suppliers?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

B2. Supplier Risk Categorisation

Audit Question: Are critical suppliers assessed using relevant modern slavery risk factors, including:

- Supplier location.
- Manufacturing location.
- Industry or product sector.
- Labour intensity.
- Use of migrant, temporary or agency labour.
- Use of subcontractors.
- Known Tier 2 suppliers.
- Previous incidents or adverse findings.
- Availability and quality of supporting evidence.

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

B3. Country of Manufacture

Audit Question: Has Viamed requested and recorded the countries where products supplied by critical suppliers are manufactured?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

B4. Subcontractors and Tier 2 Suppliers

Audit Question: Has Viamed requested details of significant subcontractors, contract manufacturers and known Tier 2 suppliers involved in the products or services supplied?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

B5. Risk Review

Audit Question: Have any suppliers, products, countries, sectors or working practices been identified as presenting increased modern slavery risk?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

- ☐ No increased risks identified ☐ Increased risks identified ☐ Risk assessment not completed
- Where risks were identified, record the controls and actions taken.

Evidence Checked: _____

Finding: _____

Section C – Supplier Due Diligence

C1. Critical Supplier Review

Audit Question: Have critical suppliers been issued with the current supplier review questionnaire or evidence request?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

C2. Supplier Code of Conduct

Audit Question: Have critical suppliers received and accepted Viamed Ltd's Supplier Code of Conduct?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

C3. Required Supplier Evidence

Audit Question: Has Viamed requested appropriate evidence from critical suppliers, including where applicable:

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

- Modern Slavery Statement or Human Rights Policy.
- Anti-Bribery and Corruption Policy.
- Code of Conduct or Ethics Policy.
- Whistleblowing procedure.
- Health and Safety Policy.
- Ethical Sourcing or Responsible Recruitment Policy.
- Modern slavery risk assessment.
- Manufacturing country information.
- Significant subcontractor or Tier 2 supplier details.
- Ethical or social audit reports.
- Corrective action plans.
- Modern slavery training records.
- Confirmation of serious incidents during the previous 12 months.

Evidence Checked: _____

Finding: _____

C4. Missing Documentation

Audit Question: Where a supplier could not provide a requested document, was an explanation obtained and were equivalent controls reviewed?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

C5. Supplier Incidents Declaration

Audit Question: Have critical suppliers confirmed whether any serious ethical, labour, human-rights or modern slavery incidents occurred during the previous 12 months?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

C6. Supplier Follow-Up

Audit Question: Are missing responses, incomplete evidence and identified risks followed up and recorded?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

Section D – Purchasing Practices

D1. Purchasing Risk Assessment

Audit Question: Has Viamed reviewed whether its purchasing practices could create pressures that increase labour exploitation risk?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

D2. Supplier Lead Times

Audit Question: Are supplier lead times agreed collaboratively without unreasonable or coercive pressure?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

D3. Pricing Practices

Audit Question: Does Viamed avoid aggressive price pressure that could result in unsustainable production costs or poor labour practices?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

D4. Forecasting and Urgent Orders

Audit Question: Are requirements communicated reasonably in advance, and are urgent or high-volume orders managed collaboratively?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

D5. Payment Practices

Audit Question: Are suppliers paid within agreed terms, with disputes resolved promptly and fairly?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

D6. Supplier Termination and Penalties

Audit Question: Does Viamed avoid unreasonable penalties, sudden contract withdrawal and automatic termination where remediation would be more appropriate?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

Section E – Training and Awareness

E1. Annual Training

Audit Question: Has relevant staff completed modern slavery awareness training during the previous 12 months?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

E2. Training Content

Audit Question: Does training cover:

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

- The meaning of modern slavery and human trafficking.
- The ILO indicators of forced labour.
- Debt bondage and recruitment fees.
- Retention of identity documents.
- Excessive overtime.
- Restriction of movement.
- Abuse of vulnerability.
- How to identify warning signs.
- How and where concerns must be reported.
- Purchasing and supplier due-diligence responsibilities.

Evidence Checked: _____

Finding: _____

E3. Staff Understanding

Audit Question: Can sampled staff explain:

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

- What modern slavery means?
- Key warning signs?
- How they would report a concern?
- Their responsibilities when reviewing suppliers?

Evidence Checked: _____
Finding: _____

E4. Supplier Communication

Audit Question: Are Viamed's modern slavery expectations communicated to critical suppliers during onboarding or annual review?

Rating:
☐ Conforming
☐ OFI
☐ Minor NC
☐ Major NC
☐ N/A

Evidence Checked: _____
Finding: _____

Section F – Reporting, Investigation and Remediation

F1. Reporting Mechanism

Audit Question: Do employees have access to a confidential reporting or whistleblowing route for suspected modern slavery or unethical conduct?

Rating:
☐ Conforming
☐ OFI
☐ Minor NC
☐ Major NC
☐ N/A

Evidence Checked: _____
Finding: _____

F2. Supplier Reporting Requirement

Audit Question: Are suppliers required to notify Viamed promptly of suspected or confirmed modern slavery incidents affecting goods or services supplied?

Rating:
☐ Conforming
☐ OFI
☐ Minor NC
☐ Major NC
☐ N/A

Evidence Checked: _____
Finding: _____

F3. Incident Response Process

Audit Question: Is there a documented process for:

Rating:
☐ Conforming
☐ OFI
☐ Minor NC
☐ Major NC
☐ N/A

- Recording the concern.
- Protecting confidentiality.
- Assessing urgency and credibility.
- Escalating to senior management.
- Contacting the supplier.
- Gathering and reviewing evidence.
- Protecting affected workers.
- Agreeing corrective action.
- Monitoring completion.
- Suspending or terminating the supplier where necessary.
- Recording findings and lessons learned.

Evidence Checked: _____
Finding: _____

F4. Response Times

Audit Question: Are clear expected timescales established for acknowledging, escalating and investigating a suspected modern slavery report?

Rating:
☐ Conforming
☐ OFI
☐ Minor NC
☐ Major NC
☐ N/A

Evidence Checked: _____
Finding: _____

F5. Corrective Action Plans

Audit Question: Where concerns or gaps are identified, are suppliers required to provide a corrective action plan covering:

- The issue or gap identified.
- Immediate containment.
- Root cause.
- Corrective action.
- Responsible person.
- Target completion date.
- Evidence of completion.
- Follow-up review.

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

F6. Incidents During the Audit Period

Audit Question: Have any suspected or confirmed modern slavery incidents been reported during the previous 12 months?

- ☐ No incidents reported ☐ Incident or concern reported
- Where applicable, confirm that the response followed the documented process.

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

Section G – Monitoring and Performance

G1. Modern Slavery KPIs

Audit Question: Are suitable modern slavery KPIs recorded and reviewed?

- Percentage of critical suppliers issued with the review.
- Percentage of critical suppliers that responded.
- Percentage accepting Viamed's Supplier Code of Conduct.
- Percentage providing modern slavery or human-rights evidence.
- Percentage with known manufacturing-country information.
- Percentage with Tier 2 information available.
- Percentage of relevant staff completing annual training.
- Number of concerns raised.
- Number of investigations opened.
- Number of corrective action plans raised.
- Number of corrective action plans closed by the target date.
- Number of suppliers rated low, medium or high risk.

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

G2. Management Review

Audit Question: Are modern slavery performance, supplier response rates, risk ratings, incidents and corrective actions reviewed by senior management at least annually?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

G3. Previous Improvement Actions

Audit Question: Have actions arising from the previous Modern Slavery Assessment, audit or management review been completed?

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

G4. Continuous Improvement

Audit Question: Have any opportunities been identified to strengthen:

- Supplier mapping.
- Tier 2 visibility.
- Risk categorisation.
- Supplier evidence requirements.
- Supplier communication.
- Staff or supplier training.
- Incident response times.
- Corrective action monitoring.
- KPI reporting.

Rating:

- ☐ Conforming
- ☐ OFI
- ☐ Minor NC
- ☐ Major NC
- ☐ N/A

Evidence Checked: _____

Finding: _____

5. Supplier Sample Reviewed

Supplier	Critical	Country Known	Questionnaire	Code Accepted	Risk Rating	Follow-Up
	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N		
	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N		
	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N		
	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N		
	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N	☐ Y ☐ N		

6. Audit Summary

Positive Findings: _____

Opportunities for Improvement: _____

Nonconformities Identified: _____

7. Corrective Action Record

Ref	Finding	Class.	Required Action	Owner	Target	Evidence	Closed

8. Overall Audit Conclusion

- ☐ The modern slavery management process is effectively implemented. ☐ The process is generally effective, with opportunities for improvement.
- ☐ Minor weaknesses were identified and corrective action is required. ☐ Significant weaknesses were identified and urgent corrective action is required.

Overall Conclusion: _____

9. Audit Sign-Off

Auditor Name	_____	Signature	_____
Date	_____	Process Owner	_____
Signature	_____	Date	_____
Senior Management Review	_____	Verification Date	_____