

Document Number:	Modern Slavery and Human Trafficking Statement	Document Title:	Modern Slavery and Human Trafficking Statement				
Revision Author:	Barbara Williams	Date Published:	31 March 2021	Revision Number:	3	Status:	Active

1. Statement Overview:

In accordance with the requirements of the Modern Slavery Act 2015 Salts Healthcare is committed to:

- act ethically and with integrity in all its business relationships,
- implement and enforce effective systems and controls to prevent acts of modern slavery and human trafficking from occurring within the business and supply chain, and
- ensure there is transparency in the business and Salts Healthcare approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act.

This statement outlines key information on the actions that have been taken by Salts Healthcare to prevent slavery and human trafficking within the business and its supply chain, during financial year ending 31 December 2020 and will be taken going forward.

2. Company Overview:

Salts Healthcare has been in operation since the early 1700's; pioneering and manufacturing products that have shaped the medical industry. A family run business that began with the making of surgical instruments and artificial limbs for injured soldiers. Salts Healthcare has grown significantly since these earlier days, continuing manufacture in the niche sector of stoma devices.

In addition to the manufacturing of these products, Salts Healthcare provides the following services:

- country-wide Customer Dispensing Centres which facilitate the operational and customer service elements of this area of the business, dispensing all FP10 listed stoma appliances in line with current pharmaceutical regulations.
- established 'Medilink Home Delivery Service' which supplies stoma patients with their personalised prescriptions.
- Salts Healthcare Medilink Stoma Care Nurse Team, consisting of specialist nurses working across the country, continually providing bespoke care and support to stoma patients in their own home or through community-based clinics.

Salts Healthcare do not just meet the needs of stoma patients here in the UK, but distribute globally, with a presence in 23 worldwide countries.

3. Supply Chain Overview:

- Suppliers of raw materials
- Suppliers of component parts
- Suppliers of Salts Branded Finished Products
- Suppliers of Competitor Finished Products
- Service Providers for delivery: PGS Global, APC etc.

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4. Due Diligence:

Our approach to the issues of modern slavery and human trafficking have been and continues to be to:

- comply with legislation and regulatory requirements
- make suppliers and service providers aware that we promote the requirements of the legislation and require our suppliers to have a similar commitment
- consider modern slavery factors when making procurement decisions
- develop an awareness of modern slavery issues

During the last twelve months (period between 1 January 2020 and 31 December 2020) we have and going forward we will continue to:

- review supplier relationships to confirm their compliance and adherence to the principles of the Modern Slavery Act,
- evaluate supplier proposals by including consideration of modern slavery points in the supplier selection process,
- carry out our company and supplier audits, assess any instances of non-compliance on a case-by-case basis and tailor remedial action appropriately, specifically by including this in our quality system review meetings,
- ensure that our policies appropriately document our approach to the issues of modern slavery and human trafficking including a review to ensure that the process of reporting concerns is clear and effective.
- work with suppliers to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

5. Risk Assessments:

Risk Assessments may be carried out where concerns have been identified from the self-declarations suppliers will complete. If such a situation arises; a relationship with potential suppliers will only be sought once a satisfactory risk assessment has been completed.

6. Counteractive Measures:

- Whistleblowing:

The Whistleblowing Policy allows employees to report concerns around workplace practices without fear of reprisal and confidence that the matter will be taken seriously and investigated appropriately. There are no restrictions on the subject matter of the issue in hand and therefore includes any concerns around slavery or human trafficking than an employee may have.

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- **Anti-Bribery Policy and Corruption Training:**

Salts Healthcare's Employee Handbook contains an Anti-Bribery Policy that all employees are issued with as part of their induction. Training on anti-bribery and corruption is given to all relevant employees. This ensures all employees whose job role may be susceptible to bribes or corruption are fully informed of what this could look like and how to respond lawfully. This training increases staff awareness and knowledge on the subject matter, whilst preventing the possibility of such instances taking place.

7. Recruitment and Selection:

The HR Department are responsible for overseeing recruitment within the Company. All HR personnel are fully trained and qualified to ensure that safe and ethical recruitment is carried out at all times. Thorough and robust employment checks conducted prior to commencement of employment at Salts Healthcare ensures good recruitment practices are maintained at all times; minimising any risk of unethical employment or negligence relating to slavery or human trafficking.

8. Use of temporary workers sourced through an employment agency:

Salts Healthcare uses only reputable employment agencies to source labour and seeks specific information from the agencies before accepting their workers. Salts Healthcare ensures that agencies used comply with the National Minimum Wage and meet Pay Parity requirements.

9. Training

Training provisions are in place for relevant members of staff managing supply chain and personnel. Modern Slavery related training will also be delivered to the Company Board and senior management staff as a part of Employee Handbook update presentations during 2021. Senior management staff is responsible for broader awareness-raising within specific departments.

10. COVID-19

Since the start of coronavirus pandemic, Salts Healthcare adopted government guidelines for Covid-19 secure workplaces, paying statutory sick pay and offering provisions of alternative time off and payment options, in order to prevent the spread of coronavirus. Our employees have been and continue to have access to all our policies and procedures, to include provisions of remote advice from managers and HR Department.

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11. Related Policies:

- Whistleblowing Policy
- Anti-Bribery Policy
- QP 06 Purchasing and Supplier Assessment Procedure
- Recruitment Policy
- Grievance Procedure
- Dignity at Work and Equal Opportunities Policy

Our statement is reviewed on an annual basis, following financial year end and will be updated based on outcome of the Modern Slavery Act 2015 and the Home Office Transparency in Supply Chains Consultation.

Signature:	
Name:	WENDY KERLEY
Position:	HUMAN RESOURCES MANAGER
Date:	31 march 2021

Approved by Board of Directors:		
Ian Taylor	Financial Director	
Robert Salt	Managing Director	
Peter Salt	Chief Executive	