

Teasdale Healthcare Equipment Ltd

Modern Slavery & Human Trafficking Policy

Compliance Framework & Code of Conduct

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Approved By:	[Board of Directors / CEO / compliance officer]
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1. Policy Purpose and Scope

Teasdale Healthcare Equipment Ltd., is committed to preventing modern slavery, human trafficking, forced labor, and child labor in all areas of our business operations and within our global supply chains. We take a zero-tolerance approach to these practices.

This policy applies to all employees, agency workers, contractors, consultants, and third-party suppliers who provide goods or services to, or on behalf of, Teasdale Healthcare Equipment Ltd.

2. Our Legal & Regulatory Commitments

We actively monitor and comply with our obligations under modern legislative frameworks, ensuring that our compliance controls align with modern standard practices:

- The UK Modern Slavery Act 2015 (Section 54): Including modern compliance rules requiring structured mandatory disclosure categories and a formal, board-level 'Accuracy Declaration'.
- The NHS Procurement Regulations: Integrating mandatory risk assessments, Modern Slavery Assessment Tool (MSAT) reviews, and contract-specific KPIs where applicable.
- The EU Forced Labour Regulation: Implementing supply chain tracing to prevent products made with forced labor from being manufactured, bought, or sold through our business.

3. Roles and Responsibilities

- The Board of Directors: Holds ultimate accountability for this policy. The Board must formally review and sign off on our annual Modern Slavery Statement, accompanied by a signed Accuracy Declaration.
- The HR Department / Head of HR: Is responsible for day-to-day policy implementation, conducting employee right-to-work checks, and administering modern slavery awareness training.

- Procurement & Supply Chain Teams: Are responsible for conducting due diligence on suppliers, assessing risk, and ensuring our anti-slavery clauses are written into all commercial contracts.
- All Staff: Must read, understand, and comply with this policy. Anyone who suspects or identifies a sign of modern slavery must report it immediately.

4. Supply Chain Due Diligence & Risk Assessment

We recognize that our greatest risk of modern slavery sits within our supply chains. To manage this, [Company Name] operates a robust due diligence program:

- Supplier Onboarding: All new suppliers must agree to our Supplier Code of Conduct, which strictly prohibits forced labor and mandates fair working hours and wages.
- Risk Mapping: We categorize suppliers based on geography, industry sectors (e.g., labor-hire, logistics, manufacturing), and labor types (such as temporary or agency workers).
- Contractual Protections: All supplier agreements include warranties that the supplier complies with anti-slavery laws, grants us the right to audit them, and allows us to terminate contracts immediately if they violate this policy.
- MSAT Integration: For relevant public sector or high-risk contracts, we require suppliers to complete the UK Government's Modern Slavery Assessment Tool (MSAT) within three months of contract award.

5. Employee Protections & Recruitment

We ensure our internal recruitment processes are ethical and transparent:

- Right to Work: We perform thorough, legal right-to-work checks on all employees before they start working for us.
- Direct Payments: We only pay wages directly into a personal bank account belonging to the employee. We do not make cash-in-hand payments.
- Agency Workers: We only use reputable, vetted recruitment agencies that adhere to the same stringent employment standards.

6. Training and Awareness

We believe education is key to identifying hidden labor exploitation.

- All staff involved in procurement, HR, and supply chain management must complete mandatory annual Modern Slavery training.
- General awareness training is provided to all employees to help them spot red flags (e.g., restricted movement, confiscated passports, signs of physical abuse, or employees living in poor, overcrowded conditions).

7. Whistleblowing & Reporting Concerns

If you suspect modern slavery is occurring in our business or supply chains, you have a duty to report it.

- Internal Reporting: Raise concerns with your Line Manager, the HR Department, or the Legal Compliance team.
- Anonymous Whistleblowing: You can report concerns confidentially through our Whistleblowing Portal at [Insert Link/Email].
- External Support: You can also contact the UK Modern Slavery Helpline on 08000 121 700 for advice and support.

We guarantee that no employee will suffer retaliation, discrimination, or disciplinary action for raising genuine concerns about modern slavery, even if those concerns turn out to be unfounded.

8. Breach of Policy

Any employee who breaches this policy will face disciplinary action up to and including summary dismissal for gross misconduct.

We will terminate our relationship with any third-party supplier, contractor, or business partner if they are found to have violated this policy or failed to take corrective action when modern slavery risks were identified.