

## **Statement of Commitment**

Polyco Healthline is a global supplier of medical and industrial disposable and re-usable gloves, polyethylene, pulp, paper, cotton, and workwear products. Through our global supply-chain we work closely with our suppliers to innovate, design, source and sell our products. As stated in the Ethical Trade Initiative (ETI) base code guidance: modern slavery is an umbrella term that includes forced labour, debt bondage, servitude, and trafficking for the purposes of labour exploitation. Our principles and commitment to assessing not only modern slavery and human trafficking but also the full extent of social accountability is built upon the ILO indicators of modern slavery and the ETI base guidelines. Our social accountability and corporate responsibility is managed through our risk management system and business policies.

#### **About Us**

Polyco Healthline provides protection and hygiene products and services for the workplace and home. Our wide and technical range — including re-useable and disposable gloves, tourniquets, polyethylene, pulp, paper, cotton and workwear — is trusted and used by multiple sectors throughout the UK and overseas.

The Polyco Healthline Group head office is situated in Bourne, Lincolnshire, together with our distribution centres, manufacturing facility and technical centre, including laboratory.

#### **Our Values**

We actively encourage dynamism and an entrepreneurial spirit with all our staff. In every area of our business, we recognise that our people are our greatest asset. We see each person as an individual, on their own career path. That is why we take care to nurture, grow and help realise their ambitions.

#### **Our Business**

Our business is organised into the following areas.

- Medical, which supplies surgical and medical examination gloves, pulp products, polyethylene products, medical equipment, and infection control products.
- Industrial, which supplies PPE equipment primarily gloves, workwear, janitorial and paper products.
- Consumer and retail, which supplies household gloves and associated consumer products such as cloths as well as our cotton wool range.
- Manufacturing production of specific food handling gloves.

All areas are supported by central functions such as Finance, Supply Chain, Category Management, Sales, Customer Services, Warehouse & Logistics, Marketing, Human Resources, IT, Management Systems and Technical.

#### **Our Policies**

Our values and mission are supported and communicated through our policies and procedures. They also set the standard for the performance and conduct of our employees and set the expectations that we have of our critical subcontractors and suppliers.

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Our policies are available on our website (https://www.polycohealthline.com/policies-statements) and include:

- Ethical Trade Policy
- Quality Policy
- Environmental Policy
- Sustainability Policy
- Corporate Responsibility Policy
- Whistle-blowing and Anti-Fraud, Bribery and Corruption Policy
- Business Continuity Policy
- Health and Safety Policy
- Reach Policy
- Privacy Policy
- Cookie Policy

#### **Our Supply Chains**

Our supply chain includes the sourcing of both raw materials and finished goods for the medical, professional and consumer markets from critical subcontractors and suppliers globally.

## Our Approach on slavery and human trafficking

We continue to collaborate with our suppliers to eradicate forced labour and ill treatment of employees within our supply chains. Polyco Healthline strongly maintains a commitment to act ethically in all social and environmental aspects and our anti-slavery and social accountability policies reflect this.

We believe that it is important to act with integrity in our business relationships and take all reasonable and practical steps (including factory and warehouse inspections and audits) to ensure that our standards are being implemented throughout the businesses of our suppliers and that all relevant local legislation and international regulations are complied with. This involves:

- Communication with suppliers to ensure an understanding of the Modern Slavery Act and our policy.
- Conduct risk assessment and information exchange through our social responsibility code of conduct and supplier assessment questionnaire.
- Review supplier performance through audit of the code of conduct and on-site activities (where required).
- Conduct an annual review of our social accountability and anti-slavery policies and performance.

Our social accountability management system is based around the International Labour Organisation (ILO) fundamental conventions and Ethical Trading Initiative (ETI) base code principles. We currently manage our systems in line with two methodologies:

- LSAS We are level 3 within the LSAS programme (there are four levels). LSAS (Labour Standards
  Assurance System) was developed by NHS supply chain in conjunction with the Department of
  Health and industry bodies to provide an extra level of corporate, social, and ethical governance
  with regards to labour standards within the supply chain.
- SMETA We are currently registered on the SEDEX website which is a global membership where
  organisations can manage their performance around labour rights, health and safety, the
  environment and business ethics. This is used specifically for our retail sector and involves audit and
  improvement processes with our suppliers.

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#### Supplier Adherence to our values

It is our ambition to source 100% of our resources from suppliers who are committed to promoting fundamental human rights. We encourage complete transparency with our suppliers, assisting where necessary to improve practices, however, we have a zero tolerance of slavery and human trafficking.

We expect all those in our supply chain and partners to comply with our values. Polyco Healthline will only trade with those suppliers who fully comply with this policy or those who are taking verifiable steps towards compliance.

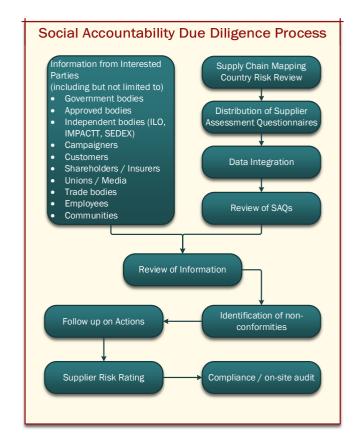
#### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training during the induction process and additionally to relevant members of staff.

#### Our aims and effectiveness in addressing slavery and human trafficking.

We use the following measures and information to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Pre-selection audits of potential supply partners
- Records from supply partners with regards to maintaining their own quality and social accountability assurance systems
- Use of third-party auditors to check supply partners.
- Continued high levels of communication and personal contact with our supply partners to reinforce their understanding of, and compliance with, our expectations.
- Corporate governance through building long term trusted and open relationships throughout our supply chain.



The foundation of our sustainability, social compliance and supply chain management utilises BRAND a software tool by International Associates that is designed to streamline and enhance the efficiency of managing our supply chain through risk evaluation; leveraging advanced geographical data to initially assess suppliers based on their location. Our supplier chain is global and includes higher risk regions such as Asia (Bahrain, China, India, Indonesia, Vietnam, Turkey, Thailand, Sri Lanaka, Pakistan).

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A Supplier Assessment Questionnaire (SAQ) is issued through the portal which each supplier completes and uploads supporting evidence, if necessary, the integrated corrective action module allows for a deeper understanding and examination of the supplier responses and actions. In support of the BRAND integrity portal, Polyco Healthline also implements on-site social compliance audits of our critical suppliers.

Due diligence with regards to human rights and social accountability is integral to the management programmes that address potential risks and implement improvement.

Our programme of social compliance includes the following sections based on the conventions of the International Labour Organisation (ILO) and the Ethical Trade Initiative (ETI); greater detail on each of the sections can be found in our Labour Standards and Ethical Trade Policy PH-CP-009).

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining.
- Working conditions are safe, healthy and hygienic.
- Child labour is not used.
- Living wages are paid.
- Working hours are not excessive and will not exceed any employment legislation.
- No discrimination is practiced.
- Regular employment is provided.
- Discipline, harassment and abuse is prohibited.
- No bribery, corruption, blackmail or bullying is permitted.
- Good environmental stewardship is practiced.

#### Our objectives

## 2023/2024 Schedule

The following objectives were agreed for 2023/2024:

- Monthly review and reporting of critical subcontractor risk rating and improvement complete.
- Maintain level 3 LSAS compliance complete.
- Develop an on-going training and awareness programme for staff, to ensure guidance and knowledge is refreshed – retraining of staff is complete; refresh of the training programme is on-going.

#### 2024/2025 Schedule

The following objectives were agreed for 2024/2025:

- Maintain level 3 LSAS compliance.
- Work towards level 4 LSAS compliance (20% completion by end 2025).
- 100% active critical suppliers to complete the updated SAQ (revision 3)
- 100% critical suppliers used for governmental / NHS contracts to have undergone an independent 11 indicators of forced labour ILO or Worldwide Responsible Accredited Production (WRAP) audit.

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#### **Summary**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's Modern Slavery Statement for the current financial year.

Should any concerns arise, or suspicious activity be noted then these need to be reported either to our Head Office (0333 320 8550) or independently through Protect (UK whistleblowing charity)

• Protect for public interest disclosure (whistleblowing):

» Protect Website: <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>

» Protect Telephone: 020 3117 2520

» Protect E-mail: https://protect-advice.org.uk/contact-protect-advice-line/

Any information disclosed will be treated in complete confidence.

This statement has been approved by our Board of Directors. It is reviewed and updated on an annual basis during April.

The statement is available through the following methods:

Website: https://www.polycohealthline.com/

• Email: Customer Services Email (<u>customer.services@polycohealthline.com</u>) or Technical Email (<u>technical@polycohealthline.com</u>)

• In writing: Polyco Healthline Ltd, South Fen Road, Bourne, PE10 0DN

• Telephone: 0333 320 8550

Modern Slavery Statement Registry: <a href="https://modern-slavery-statement-registry.service.gov.uk/">https://modern-slavery-statement-registry.service.gov.uk/</a>

Approval Signature: Date: 23 September 2024

**Approval Name:** VJames Sira **Position:** Chief Business Development Officer

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