



[EMPIRE MEDICAL UK – SALES@EMPIREMEDICAL.CO.UK](mailto:SALES@EMPIREMEDICAL.CO.UK)

## **HUMAN TRAFFICKING – THE DUE DILIGENCE POLICY OF OUR COMPANY AND AUDITING PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING.**

In terms of its supply chain, EMPIRE MEDICAL UK has robust systems in place to ensure that we eradicate modern slavery, human trafficking or child labour from our manufacturing process.

In relation to the Modern Slavery Act, it is our practice to continuously audit the members of our supply chain, such auditing and measures include;

- Unannounced site-visits – These are conducted so that we might review the physical situation at supplier premises and look for signs of sub-optimal behaviour and have opportunity to ask staff questions.
- Pre-qualification Questionnaires – These ensure that we test competence and compliance with our own minimum standards.
- Accreditation checks – to ensure that organisations are compliant with standards, such as those set out by ILO and ETI and other recognised international standards.
- Whistleblowing policy – This ensures that personnel internal and within the supply chain feel they are able to report instances of potential trafficking/modern slavery and are required to be placed around supplier premises and checked at site visit.
- Risk Assessments – Before suppliers are approved, Questionnaires and site visits form part of a risk assessment and ultimately can decide whether or not we do business with a supplier and/or terminate a relationship.
- Supplier Development – Where no alternative supply may exist, we seek to develop supplier at our own cost to meet our own minimum standards of compliance in all areas.
- Prevention Policies – Aim to prevent human trafficking and modern-day slavery through selective process of who we do business with.
- Procedure for reporting non-compliance – this includes a telephone number and e-mail address; each instance may be escalated to our compliance officer.
- Staff Training – ensures that our own personnel are able to see signs of modern slavery / human trafficking, there is a particular focus on HR and Procurement.