

# The Blatchford Group:

Parent company and wholly owned subsidiaries

Operates **inside** and **outside** of the **UK**

Advanced Technology and Patient Solutions

£106m turnover

Global Supply Chain Networks

Transparent & Fair

Protecting Human Rights

Minimum Wage Working Time Directive

Training

Risk Assessment

Blatchford is committed to supporting the elimination of Slavery and Human Trafficking from society, through effective collaboration with our supply chain.

## Blatchford Ltd

# Group Statement of Compliance with the Modern Slavery Act 2015

## Introduction From The Board Of Directors

The Modern Slavery Act 2015 came into effect on 29th October 2015. This law requires manufacturers and retailers doing business in the UK, which supply goods or services and have an annual turnover exceeding £36 million to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

Blatchford Ltd is committed to ensuring that exploitation with regards to any form of Slavery or Human Trafficking is eliminated from society. We take all practical measures to ensure that our integrity is maintained in this regard.

We have adopted responsible and ethical practices throughout our business units and made a conscious commitment to ensuring that all aspects of our business including the wider supply chains are investigated fully to address previously unidentified concerns with respect to the requirements of the Modern Slavery Act 2015.

## Organisation's Structure

The Blatchford Group consists of the UK based parent company and subsidiaries engaged in the design, manufacture, and distribution of prosthetic, orthotic, and seating products as well as the provision of rehabilitation services to the National Health Service (NHS) and Ministry of Defence (MoD) in the UK and the Norwegian Labour and Welfare Service (NAV).

This Corporate statement of compliance is valid and effective for all wholly owned subsidiaries of the parent company.

The Blatchford Group business operates both inside and outside of the United Kingdom. The members of the Blatchford Group have a combined annual turnover in excess of £106m (2022-23).

## Our Business

Our business is organised into two principal business areas: Blatchford Patient Solutions (which provides rehabilitation services) and Blatchford Products (the design, manufacture, and sale of prosthetic components).

## Our Supply Chains

Our supply chains include the sourcing of raw materials, subcontracted manufacturing activities, the purchase of 3<sup>rd</sup> party products, and the use of distribution networks related to the manufacture of rehabilitation products.



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Blatchford maintains written policies that strictly prohibit the use of slavery or human trafficking in its direct supply chain. We communicate our ethical principles and associated expectations to our supply chain through our supply chain purchasing agreements. Blatchford expect as a pre-requisite of signing these agreements, commitment focusing on but not limited to “Child Labour Avoidance”, “Freely Chosen Employment”, and “Freedom of Association” in line with the Modern Slavery Act. This commitment is mandatory and Blatchford does not deal with suppliers who do not sign up to this clause.

## Our Policy On Slavery And Human Trafficking

The Blatchford Group is committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. Our Policy, company values and actions reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our businesses or in our supply chains.

## Steps Taken To Manage Risks Of Slavery And Human Trafficking

We have ensured that all Group companies operate strict recruitment, selection, and employment policies with fair, ethical, and non-discriminatory employee practices regulated by our Human Resources departments.

The UK Clinical Service business adheres to the NHS employment check process:

1. We have verified that all Group employees are eligible to work within their region of employment and that they are paid standardised wage rates and our appropriate benefits package with full access to grievance procedures.
2. We have undertaken a full risk assessment of our business units and supply chains to identify any potential areas of non-compliance or exposure.
3. We have appointed a Regulatory Manager to verify that adequate controls are in place and enforced.
4. We have made clear our expectations of business behaviour, with regard to national or international supply chains, and we have indicated that we expect our suppliers and distributors to have suitable anti-slavery and human trafficking policies and processes.
5. We have surveyed our supplier base, covering contractors and subcontractors, and received confirmation of compliance to the requirements of the Modern Slavery Act 2015, including confirmation that they can find no evidence of concerns within their business or supply chains.
6. We have amended our standard terms and conditions of purchase to include compliance with The Modern Slavery Act as a condition of conducting business with Blatchford.

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## Supplier Adherence To Our Values

The Blatchford Group does not tolerate slavery and human trafficking. We expect all parties in our supply chain to comply with our values. We have embedded the process of ensuring confirmation from our supply chain third parties (UK and overseas) that they comply with local labour laws and regulations. New supplier procedures also check compliance to the UK Modern Slavery Act 2015.

Our Terms and conditions of supply stipulate that suppliers must comply with Blatchford's modern slavery policies.

As part of our ISO 13485 quality management system, supplier audits and supplier re-evaluation happen continuously throughout the year to verify compliance within the supply chains.

We will act in a transparent and fair way and encourage our supply chain to do so, for example, the way human rights are protected.

Compliance with legislation, including fundamental rights at work - in particular freedom of association and elimination of discrimination throughout employment.

## 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 embarked on a training programme for our staff, which included:

- The Board of Directors understanding their responsibilities.
- Group employees have received instructions and guidance to fully understand their responsibility and how to remain alert to the risks in our business and in the wider supply chains.
- Employees have been instructed that they are expected to report concerns, and management are now aware that they are expected to act upon any concerns.
- An annual programme, online and face-to-face training for employees to emphasise the importance of acting with integrity and in line with our own internal business values.

Compliance officers will incorporate guidance regarding the Modern Slavery Act into regular company training sessions and our Company Induction.

- Communication of international human rights standards including adherence to the Working Time Directive and the Minimum Wage.
- Guidance on how to report concerns or examples of non-compliance.

## Violations

The Blatchford disciplinary policy permits the termination of an employment relationship, should we have a reasonable belief that an employee is involved in any breach of the law banning forced labour, slavery, and human trafficking. We will continue to update our policies and procedures as required to ensure that we maintain appropriate safeguards against any mistreatment of persons involved in our internal business or supply chain protection of whistle-blowers.

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## Goals and KPI's

Governance; modern slavery is included as an agenda item at regulatory review meetings and recorded in the meeting minutes.

Training; raise awareness within the organisation with 100% of training completed for identified staff annually.

Risk assessment; KPI monitored for supplier evaluation and risk management of the supply chain as part of onboarding and re-evaluation of existing and new suppliers.

## Endorsement

This Statement is made in compliance with section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the current financial year ending 31st March 2023. The Statement was approved by the Board of Directors on 26<sup>th</sup> July 2023

Paul Roberts  
CEO Blatchford Group  
July 2023