

## Modern slavery statement for year 2019/2020

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that NeedleSmart has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. NeedleSmart has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### Our business

Needlesmart is a Merseyside company specialising in the development of advanced medical technology for use by clinical and healthcare professionals across the globe.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. **Recruitment Policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. **Whistleblowing Policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. **Equality and Diversity Policy.** We are committed to promoting equality and diversity and promoting a culture that actively values difference and recognises that people from different backgrounds and experiences can bring valuable insights to the workplace and enhance the way we work.

4. **Health and Safety Policy.** In managing health and safety, we create a culture that ensures that sound health and safety management is afforded the same priority as other business objectives and becomes an integral part of everything we do.
5. **Anti-Bullying and Harassment Policy.** This policy is to support our aim of being a company with a good organisational culture in a work environment that's open and positive, with employees who are happy, motivated, focused and productive

## **Our Suppliers**

NeedleSmart operates a supplier policy and maintains a preferred supplier list. Our internal policies require clear arrangements to be put in place with all new suppliers, and our zero-tolerance approach is reflected within our due diligence processes and the standard terms that our suppliers must agree to. Geographically, our supply chains are predominantly based in the UK, with some suppliers also operating internationally. Where suppliers operate within countries with a higher risk of slavery and human trafficking they are subject to further due diligence and monitoring procedure

**We may terminate the contract at any time should any instances of modern slavery come to light**

## **Approval for this statement**

This statement was approved by the Board of Directors on 1st August 2019

## **Next Review**

August 2020



**Cliff Kirby**  
**Chief Executive Officer**