Modern Slavery Statement

1. Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. It takes various forms, such as slavery, servitude, forced and compulsory labour, debt bondage and human trafficking, often in horrendous conditions from which the victim cannot escape. All of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Businesses have a key part to play in the effort to tackle this crime and protect vulnerable workers from exploitation. CODAN Ltd have a zero tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

Section 54 of the UK Modern Slavery Act (2015) requires commercial organisations that operate in the UK and have an annual turnover above £36m to produce a Slavery and Human Trafficking statement each year.

2. Statement

We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

The Modern Slavery Act specifically states that any statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'

We cannot guarantee that the entire supply chain is slavery free, and this is not a requirement, but we will demonstrate the steps we have taken to assess risk and mitigate those.

3. Organisational Information

CODAN Ltd is part of a wider organisation manufacturing and suppling medical transfer systems to the Global Medical Industry. CODAN Ltd is a Small, Medium Enterprise, as defined by the Companies Act 2006.
CODAN Ltd sell and distribute medical supplies and devices.

4. Our Supply Chain and Procurement

We purchase all the products we sell from our parent company; CODAN, from facilities in Germany, Switzerland and Portugal.

CODAN Ltd are committed to ensuring transparency in our own business and our supply chains and expect the same due diligence and commitment from our suppliers, contractors and business partners.

When procuring goods or services we have processes in place to consider Modern Slavery risks. We ensure we carry out supplier due diligence.

This includes:

- Supplier audit
- Mapping of the supply chain to identify geographical areas of higher risk
- Requiring high risk suppliers, as part of the contract, to adhere to modern slavery policies and principles

All of the CODAN companies are bound by the 'CODAN Code of Conduct'.

We also avoid purchasing practices that can increase the risk of suppliers resorting to poor practices.

Such as:

- Aggressive pricing that doesn't consider sustainable production costs
- Short lead times and late high volume orders
- Inaccurate forecasting
- Late of extended payments
- Withdrawing from contract at the last minute
- Enforcing unfair penalties for not meeting orders
- Making last minute changes to order specifications or volumes
- Providing inaccurate specifications

5. Areas of risk identified within the business and supply chain

The risk level is determined using the scale according to the global slavery index. https://www.globalslaveryindex.org on a scale of 1 to 8, with 1 being low risk and 8 being high risk.

Tier 1

Our 4 critical suppliers in our Tier 1 have a risk score of either 1,2 or 3 so all are classified as low risk and we conduct a yearly self-assessment questionnaire with them.
The additional suppliers in the UK are continually reviewed as part of our ISO 9001 Quality Certification within our internal audit process and is also documented in our management review meetings minutes.
This risk level will be reviewed yearly and reported on.

Tier 2

We have not mapped our Tier 2 suppliers at this stage and this is a business opportunity for improvement that is currently under review.

6. Policies and Processes relating to Modern Slavery

- CODAN Code of Conduct

KPIs

We will use key performance indicators (KPIs) to measure how effective our actions are to identify and address modern slavery practices in any part of our operations and supply chains have been. Below are the key performance areas that we assess:

1. Governance & due diligence
2. Procurement & supply chain
3. HR practices, training & education

Against each of these focus areas we have developed KPIs that are used to assess the effectiveness of our actions. These include:

- Risk level as identified in the global slavery index
- Completion rates for modern slavery awareness training
- The number of modern slavery cases identified and remediated

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement. This will be captured and logged within our Management Reviews.

7. Training of employees around Modern Slavery

We provide third party independent training on Modern Slavery through Mentor Learn to all employees.

The training covers:

- What modern slavery is and who can be a victim
- The impact of modern slavery
- What legislation protects people against modern slavery
- How to recognise signs that modern slavery might be occurring
- Information on who to contact if you suspect modern slavery is occurring

The training is delivered via e-learning, is mandatory and is provided on induction.

8. Reporting

If a case of Modern Slavery is suspected, then the following is advised.
A suspected victim of modern slavery is not to be confronted directly as this may endanger them.
If an immediate risk to life, then call 999

If there is no immediate risk to life, then the Modern Slavery Helpline is to be called 08000 232 700 or it will be reported online.

Employees are required to take their suspicions to their line manager.

If modern slavery is identified or suspected abroad, then we will engage with local Non-Governmental Organisations, industry bodies, trade unions or other support organisations to attempt to remedy the situation. If warranted, we will contact local government and law enforcement bodies. Our approach will always consider the safest outcome for the potential victims while also remember the economic influence and control which the organisation holds over those who may be committing these crimes.

If the response from any of our suppliers, here in the UK or abroad to concerns, seems inadequate and adequate measures are not put in place to address coercion, threat, abuse, and exploitation of workers, then we would look to give that company more support, guidance and incentives to tackle the issue. This could include working with at-risk suppliers to provide training, messages and business incentives or guidance to implement anti-slavery policies.

If, after receiving support, the supplier is not taking the issue seriously, and it remains unresolved, then we will reconsider our commercial relationship with that supplier. These actions could then be included in the next statement produced.

9. Breaches

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
Any suppliers, individuals or organisations working with us, or on our behalf who breach this policy may have their relationship or contract with us terminated.

10.   Responsibility

Mark Foulger; Country Manager, holds overall responsibility for this statement and its implementation.

11.   Review and Communication

This statement will be reviewed by senior management, signed by the Country Manager and then published on our website, and also uploaded to the following register:

- https://modern-slavery-statement-registry.service.gov.uk

Internally it will be sent to all employees and upon request sent to our supply chain and other interested stakeholders.

12. Board / Senior Management Approval

SIGNED: *Mark Foulger*

NAME: MARK FOULGER

JOB TITLE: COUNTRY MANAGER

DATE: 05.02.2024

13. Revision History

Date	Issue	Change	Carried out by
01/02/2024	1	Document creation	Sarah Joy Newton
05/02/2024	1	Production Companies and Country Manager title, wording corrections. Formatting.	Helen Quinney / S. Delahunt