

Modern Slavery And Human Trafficking 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. Assut UK 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

Assut UK is a Small, Medium Enterprise as defined by the Companies Act 2006 involved in the wholesale and distribution of surgical sutures and other surgical devices encompassing Haemostats and Laparoscopic products to private medical, primary care and NHS organisations within the United Kingdom, with a UK office in Huddersfield.

4. Our Supply Chain and Procurement

The Parent company Assut Europe is based in Italy and the products that we distribute in the UK come from them as our Tier 1 supplier.

The rest of our Tier 1 suppliers consist mainly of utilities and delivery organisations.

We have also mapped our Tier 2 suppliers as they relate the Assut Europe, the supplier of the core products we distribute.

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:

- Robust supplier selection and policies
- Supplier questionnaire and audit
- Mapping of the supply chain to identify geographical areas of higher risk as defined by <https://www.globallslaveryindex.org>
- Requiring high risk suppliers, as part of the contract, to adhere to modern slavery policies and principles

We 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 or 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

Supplier risk assessment:

- The risk level is determined using the scale according to the global slavery index. <https://www.globallslaveryindex.org>
- This is cross referenced with the list of goods from the US department of Labour that have been identified to be at higher risk of being produced by child or forced labour. <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>
- [Then the sector is checked against the ILO's Global Estimates of Modern Slavery](#)

Tier 1

The nature of the organisational structure means that the risk within the business and supply chain for Tier 1 is identified as **low**.

For our product supplier, Assut Europe we conduct a yearly self-assessment questionnaire with them and have mapped their Tier 1 suppliers.

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

Most of the suppliers in our Tier 2 are identified as **low or very low risk**.

This risk level will be reviewed yearly and reported on.

Policies and Processes relating to Modern Slavery

Due diligence processes and policies are in place, and these are available on request.

- Ethical Trading, Human Rights and Labour Standards Policy
- Supplier Audit
- Supplier 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:

- Number of suppliers completing our PQQ with the inclusion of modern slavery questionnaire;
- Completion rates for modern slavery awareness training; and
- 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.

6. Training of employees around Modern Slavery

We provide third party independent training on Modern Slavery through 'Tick the Box Compliance Solutions' to all employees.

The training covers:

- The ILOs Forced labour indicators
- The training ensures that recipients understand
 - Indicators of modern slavery
 - How to report suspicions of modern slavery
 - The modern slavery statement requirements
 - How to consider modern slavery risks in procurement
 - How to be better equipped to undertake modern slavery due diligence for the organisation

The training is delivered via e-learning and participants are required to pass the course using a competency-based exam.

The training is mandatory and is provided on induction and then every 12 months.

7. 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 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.

8. 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.

9. Responsibility

Nicholas Perry, Assut UK Managing Director is responsible for this policy and its implementation across the organisation.

Review and Communication

This statement is reviewed yearly by senior management and signed by the director. It is published on our website; <https://www.assuteurope.com/en/paesi/uk-en/> and also uploaded to the following register:

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

Internally it will be sent to all employees and any other interested stakeholders.

Signed:



Nicholas Perry
Managing Director
11/06.2024

Review History

Date	Change	Carried out by
11/10/2023	Modern Slavery Register info Changed and Assut website link added	SJN
11/06/2024	Breaches put along with how the level of supplier risk is identified with the latest ILO requirements	AH