





AURELIA® GLOVES

A SUPERMAX HEALTHCARE BRAND

QMS **Supermax Healthcare Ltd** Document No: **PO-01**

Title: **Modern Slavery Act Policy** Revision No: **5.0**

Date Issued: **17/07/2023** Page No: **1 of 5**

Signature of the Group QA, RA & Technical Manager: 	Signature of the Managing Director: 
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Modern Slavery Act Policy

This document outlines the Modern Slavery and Human Trafficking Policy for Supermax Healthcare Ltd.

1.0 Scope

This scope of this policy covers all Supermax Healthcare Ltd staff, all work undertaken at Supermax Healthcare Ltd or by Supermax Healthcare Ltd employees and the Ethical Standards of all supply chains for products bought by the business. The Ethical standards of our supply chain is especially important in ensuring the welfare and safety of anyone who contributed to our business.

2.0 Our business and our structure

Supermax Healthcare Ltd (UK) and Supermax Healthcare (Europe) Ltd are the UK and European subsidiary companies of Supermax Corporation Berhad, the world's 2nd largest manufacturer of disposable examination gloves.

Our UK and European Headquarters are based in Peterborough from where we distribute to the whole of Europe.

Globally, Supermax employ over 3000 employees, with the Supermax Healthcare subsidiary employing 20 – 40 people.

3.0 Managing Director

The Group Managing Director has set the tone for the business to follow Ethical policies and principles for ourselves and our Manufacturing partners to ensure that the impacts of business operations is Eliminated, Substituted or Reduced.

4.0 Senior Management Team

The Senior Management Team are responsible for ensuring that the activities under their control, and their teams follow the principles of Ethical Standards and the elimination of Modern Slavery, set by the business. Any KPI or projects that are required by the business to achieve Ethical Standards goals should be maintained and reported back to the business.



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All defined ethical objectives, targets and improvement actions related to departmental activities must be regularly reviewed, and reviews and progress recorded based on SMART Objectives and Plan Do Check Act (PDCA) principles.

Decision making by Managers and Leaders should include Ethical considerations as a priority in addition to Cost, Quality, Environmental and Safety considerations.

Any Non-Conformities, CAPA, audit results, records, or other routine systems required should be attended to, rectified and responded to in good time by the appropriate Manager.

5.0 Senior Manager Responsible

The Group QA, RA & Technical Manager is responsible for the implementation, maintenance and monitoring of Ethical Policies and business Management Systems to effectively roll out to the business, and for reporting results to the business.

The Group QA, RA & Technical Manager requires support from other Senior Leaders and staff within the business, and has been empowered to request this as appropriate.

The Group QA, RA & Technical Manager sits on the Senior Leadership Team, and directly feeds back Ethical issues and improvements on a routine basis.

The business strategy for Ethical Standards will be communicated to the Senior Leadership team, to staff, and through the supply chain and on our internet site.

6.0 Our policy

Supermax Healthcare Ltd Slavery & Trafficking policy is embedded within the Quality Management System, document reference PO-01.

Modern Slavery is a crime and violation of fundamental human rights. It can be in various forms which can include:-

- Slavery
- Servitude
- Forced and compulsory Labour
- Human Trafficking
- Child Labour

All of these are the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Human Trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.



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Supermax Healthcare LTD has a zero-tolerance approach to modern slavery and are committed to act ethically with all dealings and relationships. They are also committed to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in the company or supply chains.



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7.0 Our supply chains and due diligence processes

Supermax Healthcare Ltd is committed to ensuring that the organisation and its supply chains are free of slavery and human trafficking, and that the necessary due diligence is undertaken to provide assurance of this. We are committed to undertake any continual improvement of our systems or working practices to maintain this commitment. The QA, RA & Technical Manager has overall responsibility for this area of compliance.

Supermax Healthcare Ltd have put a due diligence process in place to prevent the organisation from being involved with modern slavery in anyway.

8.0 Whistleblowing

Whistleblowing is the term used when a worker passes on information concerning any wrong doings. When an employee reports any wrongdoing in an organization. This can include discrimination, financial misconduct and harassment.

Supermax Healthcare Ltd have systems in place to encourage the reporting of concerns and the protections of whistle blowers. They will support all employees who raise genuine concerns regarding this policy even if they could be mistaken and will ensure that no one suffers any discriminatory treatment because of them raising a concern.

9.0 Risk Assessment

Our risk analysis for modern slavery and human trafficking affecting our organisation concluded that this is a low risk. The business areas most likely to be affected by modern slavery are new goods purchased and possibly some general procurement for the organisation.

10.0 Purchasing

Our Purchasing Team secures statements from all suppliers of new goods guaranteeing their compliance with the Act. They cannot be engaged without this compliance statement. If it is considered necessary, they will be asked to provide further assurances.

Supermax Healthcare's procurement practices incorporate processes to ensure that our major suppliers of goods comply with the requirements of the Modern Slavery Act 2015.

Depending on the type of goods being provided and the origin of the supply chains involved, further due diligence may be undertaken if necessary.

11.0 Effectiveness and Assurance

Supermax Healthcare Ltd would not tolerate slavery and human trafficking in our supply chains and would terminate our relationship with any suppliers where there was evidence of their failure to comply with the Modern Slavery Act.

Supermax Healthcare Ltd is satisfied that, over the last financial year, there has been no evidence of any connection with modern slavery or human trafficking, either within the organisation or through any of our suppliers or sub-contractors.



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Although it is important to undertake due diligence with our suppliers, we do not consider that it is necessary to set any performance indicators for this area. We have not so far needed to take any action against a supplier.

12.0 Our policies in relation to modern slavery and human trafficking

We are a value led organisation and we have several policies which relate to modern slavery and human trafficking. Our policies on recruitment, whistleblowing, anti-bribery, equality & diversity, disciplinary and procurement procedures should ensure that modern slavery of any form will not directly impinge on our organisation.

13.0 Training our staff about slavery and human trafficking

Staff who work in the areas likely to be affected by modern slavery are trained in our procedures for ensuring that the organisation and its supply chains remain free of slavery and human trafficking. This training is included within the induction process and is also communicated to all suppliers, contractors, and business partners.

14.0 Review

This policy will be reviewed annually by the Management Team and will be updated if there have been any changes to government legislations.

15.0 Revision History

Revision No.	Summary of change	Change Control No:	Date:	By:
1.0	New Policy	N/A	Pre-QMS	DT
2.0	Revision of Policy	009	17/09/2020	DT
3.0	Revision of Policy	034	06/07/2021	DT
4.0	Information added regarding Modern slavery, human trafficking and whistle blowing.	060	19/10/2021	SM
5.0	Review of Policy	150	17/07/2023	DT