

Eakin Investments Limited – Group Statement of compliance with The Modern Slavery Act 2015

INTRODUCTION FROM THE BOARD OF DIRECTORS

The Eakin Healthcare Group (consisting of Eakin Investments Limited and its subsidiary companies) is committed to ensuring that exploitation with regards to any form of slavery or human trafficking is eliminated from society. As well as adopting responsible and ethical practices throughout our business units, we have also made a conscious commitment to ensuring that our business, including the wider supply chains, are investigated to address previously unidentified concerns with respect to the requirements of The Modern Slavery Act 2015.

ORGANISATION'S STRUCTURE

The Eakin Healthcare Group consists of several wholly owned subsidiaries engaged in the manufacturing and distribution of ostomy and wound care appliances and surgical instruments. Eakin Investments Limited is the ultimate parent company of TG Eakin Limited, Pelican Healthcare Limited, Eakin R&D Limited, Pelican Feminine Healthcare Limited (and its subsidiaries Single Use Surgical Inc and Pelispec Limited), Eakin Japan KK and Respond Healthcare Limited and this corporate statement of compliance is valid and effective for all wholly owned subsidiaries of the parent company.

The Eakin Healthcare Group operates inside and outside of the United Kingdom. The companies within the Eakin Healthcare Group have a combined annual turnover in excess of £36m.

OUR BUSINESS

Our business is organised into three principal business areas: Ostomy and Wound Care manufacturing, Surgical Instruments manufacturing, and distribution of Ostomy and Ancillary Care Products.

OUR SUPPLY CHAINS

Our supply chains include the sourcing of raw materials, subcontracted manufacturing activities and distribution networks related to the manufacture of medical appliances and surgical instruments. A significant proportion of our manufacturing is carried out in-house under direct management control.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

The Eakin Healthcare Group is endeavouring to ensure that there is no slavery or human trafficking in our supply chains or in any part of our business. Our policy reflects 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 are not taking place anywhere in our businesses or in our supply chains.

STEPS TAKEN TO MANAGE RISKS ON SLAVERY AND HUMAN TRAFFICKING

The steps that have been taken during the financial year to ensure that slavery and human trafficking are not taking place in any of the Group's supply chains, or in any part of its business include:

1. We continue to monitor our business units and supply chains to identify any potential areas of non-compliance or exposure.
2. We have designated personnel within the Group who oversee the Regulatory function to verify that adequate controls are in place and enforced.

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3. We have ensured that all Group companies operate strict recruitment, selection and employment practices with fair, ethical and non-discriminatory employee practices regulated by our Human Resources department.
4. 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. The Eakin Healthcare Group does not operate any zero-hour contracts.
5. We have made clear our expectations of business behaviour, with regards to national or international supply chains, and we have indicated that we expect our suppliers to have suitable anti-slavery and human trafficking policies and processes.
6. We have continued the process of obtaining confirmation of compliance to the requirements of The Modern Slavery Act 2015 from all suppliers, contractors and subcontractors including confirmation that they can find no evidence of concerns within their business or supply chains.

SUPPLIER ADHERENCE TO OUR VALUES

The Eakin Healthcare Group does not tolerate slavery and human trafficking. We expect all parties in our supply chain to comply with our values. We actively seek confirmation from our supply chain third parties (UK and overseas) that they comply with local labour laws and regulations.

We have continued the process of reviewing and revising our terms and conditions of supply within the supply chains.

We have completed some supplier audits covering the ethical considerations of procurement strategy for the Group and we have included detailed compliance questions on the onsite supplier audit checklists.

BOARD OF DIRECTORS' RESPONSIBILITIES


The Board of Directors understands its responsibilities and Group employees receive instructions and guidance, as needed, to fully understand their responsibility to be alert to the risks in our business and in the wider supply chains. Staff are instructed to report concerns, with management being tasked with the expectation of the Board of Directors that they take appropriate action.

We have put in place appropriate frameworks to encourage the reporting of concerns and to ensure the protection of whistle blowers.

ENDORSEMENT

This Statement is made in compliance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Eakin Healthcare Group's slavery and human trafficking statement for the financial year ending 31 March 2019. The statement was approved by the Board of Directors on 28 June 2019.

Signed on behalf of the Board of Directors:

 , 28 - June 2019