

Bailey Instruments Ltd – Modern Slavery Statement

Introduction

Modern slavery is a crime and a morally reprehensible act that deprives a person of their liberty for another person's gain. It is a real problem for millions of people around the world who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its operations and its supply chain.

At Bailey Instruments Ltd, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We are already taking steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we are taking to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking.

Our business and supply chains

Bailey Instruments Ltd are a UK business based in Manchester who supply a range of products across podiatry, orthotics, ENT and other clinical areas. The business has been established for c. 40 years and is organised with head office and warehousing functions in the UK and it procures products from a limited number of Asian based suppliers who are typically characterised by having a trusted, long-standing relationship with Bailey which span several decades.

We establish a relationship of trust and integrity with our suppliers, which is built upon mutually beneficial factors. Our supplier selection includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

Risk assessment

We conduct risk assessment of our supply chain within the management of our existing contracts by taking into account:

- The risk profile of individual countries
- The products rendered by the suppliers
- News analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Policies

Bailey Instruments Ltd operates the following for identifying and preventing slavery and human trafficking in our operations:

- We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- We also encourage employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Supplier due diligence

Bailey Instruments Ltd conducts checks on all new suppliers and on existing suppliers. This includes:

- Assessing risks in the provision of particular products
- Monitoring the suppliers, their health and safety standards and team management
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We are in the process of requiring all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness

Bailey Instruments Ltd is raising awareness of modern slavery issues by communicating to all staff focused specifically on modern slavery and explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, Bailey Instruments will be rolling out an e-learning course to all employees and communication to key supplier contacts which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices



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Bailey

Instruments LTD

- How employees should respond if they suspect slavery or human trafficking
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps Bailey Instruments Ltd will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by Bailey Instruments Ltd anti-slavery statement

Measuring how we're performing

Bailey Instruments Ltd is defining a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These will include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?

This statement covers 1 January 2024 to 31 December 2024 and has been approved by a director of Bailey Instruments Ltd.

Signed: *M. Holdaway*

Date: 1ST of January 2024



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