

Modern Slavery and Human Trafficking Policy

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Amendment Record

Date	Issue	CR	Reason for Amendment	Author
24/10/2023	001		Initial version	Stella Morris

1. Purpose

1.1. This document defines C-Pro Direct’s Modern Slavery and Human Trafficking Policy

2. Scope

2.1. This document sets out the steps C-Pro Direct has taken to understand all potential modern slavery risks related to the business to ensure that slavery and human trafficking do not take place in our business or our supply chain.

3. References

Reference	Title
022_GEN	Employee Handbook
084_PRO	Managed Supplier Process

4. Responsibilities

Role	Responsibility
All Staff	It is the responsibility of all staff to ensure they have read and understood this policy, and the Anti Slavery policy for Employees in the Employee Handbook, which forms part of their contract
Procurement staff	Ensuring they are familiar with, and implement C-Pro’s Managed Supplier Process
Directors	To review and communicate this policy internally and on the C-Pro Website

5. What is Modern Slavery? (credit to Walk Free, Global Slavery Index)

5.1. Modern slavery takes many forms and is known by many names. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, or deception. Modern slavery includes forced labour, forced or servile marriage, debt

bondage, forced commercial sexual exploitation, human trafficking, slavery-like practices, and the sale and exploitation of children. In all its forms, it is the removal of a person’s freedom — their freedom to accept or refuse a job, their freedom to leave one employer for another, or their freedom to decide if, when, and whom to marry — in order to exploit them for personal or financial gain.

6. About C-Pro

- 6.1. C-Pro Direct is a small business that designs, manufactures, and distributes medical devices primarily for children born with lower limb conditions such as clubfoot. We have customers and suppliers in UK, Europe and worldwide.
- 6.2. C-Pro Direct works diligently to ensure that its policies are compliant with regulatory rules, laws and medical device regulations. C_Pro Direct has robust, audited processes in accordance with its ISO 13485 Medical Devices accreditation. C-Pro Direct has strong moral and ethical values which are communicated and form part of staff Employment Contracts.

7. Commitment to the Principles of the Modern Slavery Act 2015

- 7.1. C-Pro Direct is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.
- 7.2. The Company has a zero-tolerance approach to modern slavery, and is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the business or in any supply chains.
- 7.3. C-Pro Direct is also committed to ensuring there is transparency in the business, consistent with disclosure obligations under the Modern Slavery Act 2015.
- 7.4. As an equal opportunities employer, C-Pro Direct is committed to creating and ensuring a non-discriminatory and respectful working environment for staff. C-Pro Direct wants all staff to feel confident that they can expose wrongdoing without any risk to themselves.
- 7.5. C-Pro Direct’s recruitment and HR processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.
- 7.6. C-Pro Direct does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forces or compulsory labour.

8. Our Supply Chain – Risk Assessment

- 8.1. C-Pro Direct uses the Global Slavery Index to assess the risk of using suppliers in various countries.
- 8.2. C-Pro Direct assesses itself as low risk for the following reasons:
 - 8.2.1. All suppliers are assessed prior to Contract and sign the Ethical Declaration as below :

“I/we declare that we do not use or recruit child labour, no forced, bonded or involuntary labour is used, we operate within the requirements of the Modern Slavery Act 2015 and that all work areas are of a fit and proper condition and safe for workers to perform their duties in.”
 - 8.2.2. C-Pro Direct endeavours to engage only with suppliers who respect human rights and who sign up to its Ethical Declaration. Where there is a small number of critical suppliers located in higher risk countries, C-Pro Direct takes additional steps to mitigate to very low levels the risk of modern slavery within the supply chain.
 - 8.2.3. C-Pro Direct works with a small number of very well established suppliers who themselves have demonstrated during engagement with them, a commitment to staff wellbeing and good working conditions. C-Pro Direct understands these businesses and has built relationships with them over a number of years.
 - 8.2.4. Where necessary, due to technical expertise and capabilities, C-Pro Direct will engage suppliers from higher risk jurisdictions and will take additional measures during the Supplier

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Assessment process to ensure it works with only highly professional, modern, quality assessed suppliers committed to ethical standards.

8.2.5. For critical or material suppliers, C-Pro Direct’s selection process includes additional ‘getting to know’ activities which for example would include site visits from senior staff where possible.

8.2.6. C-Pro Direct’s ISO13485 Medical Device Quality Management System includes external and internal auditing against Supplier Management processes.

9. Our Business – Risk Assessment

9.1. C-Pro Direct assesses itself to be very low risk within the business. All staff are eligible to work in UK, and have signed that they have read and understand all the policies in the Employee Handbook 022_GEN. Our Employee code of conduct makes it clear to employees the actions and behaviour expected of them when representing the company.

10. Employees in relation to the Modern Slavery Act 2015

10.1. C-Pro Direct’s Employee Handbook 022_GEN , given to all staff when joining C-Pro Direct, and when updated, contains advice and information in the following areas:

- 10.2. Equal Opportunities
- 10.3. Family rights
- 10.4. Transparency and Open Dealing
- 10.5. Whistleblowing
- 10.6. Ethics and Conflict of Interest
- 10.7. Antibribery and Corruption
- 10.8. Confidentiality and Publicity
- 10.9. Personal Records and Your Personal Data
- 10.10. Grievance and Discipline
- 10.11. Social Media Rules
- 10.12. Health and Safety
- 10.13. Security on Site
- 10.14. Anti Slavery

11. Embedding the Principles of Modern Slavery Act 2015

- 11.1.C-Pro Direct will continue to embed the principles through:
- 11.2.Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking (included in employee handbook)
- 11.3.Ensuring staff involved in procurement activity follow the Managed Supplier Process including reviewing and monitoring suppliers regularly.
- 11.4.Ensuring that consideration of the modern slavery risks and prevention are added to C-Pro Direct’s policy review process as an employer and procurer of goods and services, under ISO 13485 processes.
- 11.5.Making sure C-Pro Direct’s procurement strategies and contract terms and conditions include reference to modern slavery and human trafficking.
- 11.6.Continuing to take action to embed a zero tolerance policy towards modern slavery, including reviewing this policy at least annually

12. Approval and Review

- 12.1.This policy has been approved by Stella Morris and Philip Morris , Directors of C-Pro Direct Ltd, for the financial year ending 31 April 2024.
- 12.2.This statement will be reviewed by the Management Team and updated at least every year.