

WELLAND MEDICAL LIMITED

STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015

INTRODUCTION BY THE BOARD OF DIRECTORS

Welland Medical Limited (“Welland” “we” “us”) is committed to act ethically and with integrity in all of our business activities and partnerships. In particular, we will not tolerate any supplier, representative or business partner found to be involved in slavery, servitude and forced or compulsory labour, or human trafficking, and we strive for continuous improvement in maintaining the highest ethical business practices within the company and throughout our supply chain. We are committed to improving our practices to combat slavery, human trafficking and child labour. To this end, we have and shall continue to put into place practices and policies which support the aspirations and objectives of the Modern Slavery Act 2015.

OUR BUSINESS STRUCTURE

Welland Medical Limited was founded in 1987 and in 1997 became a member of the Clinimed Group of Companies. It is now a wholly owned subsidiary of Clinimed (Holdings) Limited, a privately owned company with headquarters in High Wycombe, Buckinghamshire, which wholly owns six other UK based subsidiaries: Clinimed Limited, Securicare (Medical) Limited, Flexible Medical Packaging Limited, Helapet Limited, Careflex Limited and Hydrokem Aerosols Limited.

Clinimed Limited, as a distributor of medical devices in the fields of ostomy, wound and continence care, is Welland’s appointed distributor in the UK, and we are supported by Clinimed (Holdings) Limited, which as our parent company, provides legal, financial, HR support and overall direction to the Group from its offices in Marlow, Buckinghamshire.

Welland is a designer and manufacturer of ostomy appliances which we supply to the healthcare sector both within the UK through Clinimed Limited, and globally through our distributor network. We also procure a limited range of own-brand products from other Clinimed Group companies. We employ 281 staff, all based at our plant in Crawley, West Sussex.

OUR SUPPLY CHAINS

We have considered our main sources of supply of goods and raw materials, as well as our customer base which comprises approximately 40 distributors globally. We regularly meet with all our distributors and, additionally, invite all our distributors to regular distributor meetings in the UK. The overwhelming majority of our distributors are individuals or companies we have been working with over the long term: we know them well, and they know us as a company and part of a Group with the highest ethical standards.

Our raw materials and distributed goods are mainly sourced from within the UK or Europe, but we also have certain suppliers in other parts of the world and continue to add new suppliers, subject to due diligence and risk assessment.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Our Purchasing Policy sets out the parameters for the purchase of all goods and services, including the commitment to act ethically, transparently, fairly, and in a non-discriminatory manner. We ensure that the risk of modern slavery is recognised and forms an intrinsic part of purchasing decisions and practices.

We have implemented and seek to continuously improve systems which have the objective of:

- Fully understanding our supply chains.
- Identifying and assessing potential risk areas in our supply chains, including having regard to the geographical location of suppliers and the monitoring of such locations against the Transparency International Corruption Perceptions Index.
- Regularly auditing our suppliers. Where possible, this includes physical audits worldwide, which provide an opportunity to observe and converse with workers at supplier premises.

Audit provides the opportunity to work with suppliers to mitigate the risk of slavery and human trafficking should they be found to be occurring in our supply chains.

In 2023, 10 suppliers were identified and audited to either ISO 9001, ISO 13485 standards or equivalent.

- Continuously monitoring potential risk areas in our supply chains.
- Protecting whistle blowers.

EMPLOYMENT PROCEDURES AND POLICIES

- Recruitment policy. We operate a robust recruitment policy, including conducting 'eligibility to work in the UK' checks for all potential staff to safeguard against human trafficking or individuals being forced to work against their will.
- Protection of Employees - by maintaining and communicating clear policies and procedures, for example, effective grievance and dignity at work policies, all staff know that they can raise concerns about how they and their colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. Our policies are designed and strictly adhered to as reassurance to our workers that our Group treats them fairly, equally and transparently and complies with all relevant legislation and best practice.

- We only employ agency workers through reputable employment agencies who are working under one of the industry's governance schemes.

We are proud to be accredited to Investors in People Gold.

The wellbeing of our staff is an important focus for us, and we have six trained Mental Health First Aiders who are known to and available for all staff. Our Line Managers receive mental health awareness training.

We conduct staff surveys at least annually: we feed back results to the staff and ensure that they can see that we use the findings to make improvements where requirements have been identified. The latest survey uses an eNPS (net promoter) score, which we aim to improve year on year via our action plans for communication and engagement with our staff, which we will be undertaking via focus groups and workshops with our staff. We have an employee forum which meets quarterly to enable staff to raise suggestions or queries from staff to support our continuous engagement.

POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Modern Slavery Act Statement 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 is not taking place anywhere in our supply chains.

We have the following policies in place which reinforce our stance on Modern Slavery and good labour standards: Procurement Policy, Complaints Procedure, Recruitment Policy & Recruitment Eligibility Check Policy, Grievance Procedure, Disciplinary Procedure, PDR Policy & Procedure, Dignity at Work Policy, Induction Policy and a Training & Development Policy.

SUPPLIER ADHERENCE TO OUR VALUES

To ensure all those in our supply chain, and contractors, comply with our values we shall expand our existing work to improve our supply chain compliance programme, involving the due diligence steps outlined above, by a structured audit programme of suppliers. This is conducted by our quality team, accompanied by a member of our procurement department who will ask specific questions in the area of labour standards and modern slavery, and take appropriate corrective action if concerns are noted. Our supplier evaluation questionnaires include appropriate questions and sections concerning ethical practices, and audit responses inform our risk assessment which is regularly reviewed.

Our Corporate Social Responsibility Questionnaire and Supplier Evaluation Questionnaire include an acknowledgement and acceptance of the principles set out in our Modern Slavery statement.

A total of 57 Corporate Social Responsibility Questionnaires have been sent in the past 12 months with answers reviewed to ensure that suppliers comply with our policies.

We shall disseminate this statement to our key suppliers and distributors.

TRAINING

Our values, to which all our staff contribute and share, underpin the Company's ethos:

Excellence – Innovation – Integrity – Quality - Wellbeing

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we train our staff on the issue of modern slavery. We foster an environment in which all our staff feel empowered to, and secure in, raising any concerns they may have.

We shall disseminate this statement to our staff.

In the next 12 months, we shall include a module on Modern Slavery in our online training programme.

Our senior procurement professionals are members of CIPS (Chartered Institute of Purchasing and Supply) which, as an organisation, has a wealth of guidance and online training available. We encourage procurement staff to carry out this training and to use the CIPS website for further guidance in this field.

FURTHER STEPS

We shall review compliance throughout the coming year, and future statements will demonstrate the development and the attainment of the goals expressed herein.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Welland Medical Limited's slavery and human trafficking statement for the financial year ending 31st December 2023. It has been approved by the Boards of Directors of Clinimed (Holdings) Limited and Welland Medical Limited.



Nigel D Piercey,
Group Chairman,

Clinimed Group of Companies.



Sean L Farbrother
Chief Executive

Chairman of Welland Medical Ltd.

Date: 27 June 2024