

Modern Slavery Policy: Minnigard Medical Ltd

1. Introduction:

Minnigard Medical Ltd ("Minnigard Medical") is committed to preventing all forms of modern slavery and human trafficking within our operations and supply chain. This **Modern Slavery Policy** reflects our dedication to upholding human rights, ethical business practices, and legal compliance, particularly in accordance with the **Modern Slavery Act 2015**. We aim to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain.

2. Policy Statement:

- Minnigard Medical condemns slavery, forced labor, human trafficking, and all forms of exploitation. We will not tolerate such practices within our business or supply chain.
- We are committed to conducting our business with integrity, honesty, and transparency, and we expect the same from our suppliers, contractors, and business partners.
- We recognize our responsibility to identify and address risks of modern slavery and human trafficking in our operations and supply chain and to take appropriate measures to mitigate these risks.
- We are committed to providing training and awareness programs to our employees and suppliers to increase understanding of modern slavery risks and to ensure compliance with our **Modern Slavery Policy**.

3. Organisational Structure and Supply Chain:

Minnigard Medical Ltd is a start-up specializing in the supply of medical products and services. Our operations primarily involve the procurement and distribution of healthcare-related products. We have a range of suppliers, including manufacturers and distributors of medical equipment, as well as logistics and transportation providers. We are dedicated to ensuring that every step in our supply chain is free from slavery and human trafficking.

4. Responsibilities:

- **Management:** Senior management at Minnigard Medical is responsible for ensuring compliance with this **Modern Slavery Policy** and for implementing measures to prevent and detect modern slavery within the organization.
- **Employees:** All employees are expected to familiarize themselves with this policy, report any concerns or suspicions of modern slavery to management, and cooperate with investigations as necessary.
- **Suppliers and Contractors:** We expect our suppliers and contractors to adhere to ethical business practices and comply with all applicable laws and regulations related to modern slavery and human trafficking.

5. Compliance with the Modern Slavery Act 2015:

Minnigard Medical Ltd is fully committed to complying with the **Modern Slavery Act 2015** and the provisions contained therein. As a UK-based company, we will continue to assess and monitor our operations and supply chain to ensure that modern slavery and human trafficking do not occur in any part of our business.

This policy reflects our ongoing commitment to the principles outlined in the Act, which includes:

- **Transparency in supply chains:** We ensure that our supply chain partners adhere to ethical labor practices and maintain transparency in their operations.
- **Due diligence:** We conduct regular due diligence on suppliers and contractors to verify that they comply with the Modern Slavery Act 2015.
- **Training and awareness:** We provide training to our employees and suppliers to help them understand the risks of modern slavery and human trafficking.

6. Risk Assessment and Due Diligence:

- **Risk Assessment:** Minnigard Medical conducts regular risk assessments to identify potential areas of vulnerability to modern slavery within our operations and supply chain.
 - We assess factors such as geographical location, industry sector, and the nature of our business relationships to determine the level of risk and implement appropriate risk mitigation measures.
- **Due Diligence:** We conduct due diligence on all new suppliers and contractors to assess their compliance with our **Modern Slavery Policy** and to identify any potential risks of modern slavery or human trafficking in their operations or supply chain.
 - We require suppliers and contractors to provide assurance of their commitment to ethical labor practices and to cooperate with any audits or inspections conducted by Minnigard Medical.

7. Parts of Business with Risk and Management Steps:

We have identified that our supply chain, particularly with overseas manufacturers and logistics providers, may be at risk for modern slavery practices due to factors such as local labor laws and working conditions.

To manage these risks, we:

- Conduct supplier audits and inspections to ensure adherence to ethical labor practices.
- Engage with suppliers to implement stronger labor rights protocols and demand transparency in their supply chains.
- Establish long-term partnerships with suppliers who share our commitment to human rights and ethical business practices.

8. Effectiveness of Measures and Performance Indicators:

We evaluate the effectiveness of our anti-slavery measures through:

- Regular audits and checks on our suppliers and operations.
- Reporting and whistleblowing systems to encourage transparency and accountability.
- Reviewing compliance against key performance indicators such as supplier adherence to ethical practices, and the number of reported incidents of slavery or human trafficking.

9. Training and Awareness:

Minnigard Medical provides regular training and awareness programs to employees, suppliers, and contractors to increase understanding of modern slavery risks and promote compliance with our **Modern Slavery Policy**.

- Training includes information on identifying signs of modern slavery, reporting procedures, and the importance of ethical business conduct.
- We aim for 100% employee participation in our training programs by 2025.

10. Reporting and Whistleblowing:

We encourage employees, suppliers, and other stakeholders to report any concerns or suspicions of modern slavery or human trafficking promptly and confidentially through our whistleblowing channels.

- Reports will be thoroughly investigated, and appropriate action will be taken in accordance with our policies and procedures.

11. Review and Improvement:

We regularly review and update our **Modern Slavery Policy** to ensure its effectiveness and compliance with legal requirements and industry best practices.

- We welcome feedback from employees, suppliers, and other stakeholders to continuously improve our approach to preventing and addressing modern slavery risks.

12. Conclusion:

At Minnigard Medical Ltd, we are committed to promoting ethical business practices and upholding human rights in all aspects of our operations and supply chain. Through this **Modern Slavery Policy**, we reaffirm our commitment to combatting modern slavery and human trafficking. We strive to create a world where all individuals are treated with dignity, respect, and fairness.
