

## **Modern Slavery Statement**

**Last updated: September 2021**

### **Introduction**

Altomed Limited (Altomed) supports the provisions set out in the Modern Slavery Act 2015 (Act) and has taken steps to prevent modern slavery occurring in its supply chain and within its own operations.

This statement has been published in accordance with Section 54 of the Act. This statement details the steps taken by Altomed to identify and take steps to prevent modern slavery and human trafficking in all parts of its business and supply chains across its operations.

### **Business Structure and Supply Chains**

Altomed employs ~25 people in the UK. Altomed has a centralised procurement function and its board of directors provides accountability within a clear legal and compliance framework.

Altomed spends approximately £4 million annually with over 50 suppliers across 12 countries. The majority of our suppliers operated in the USA, the UK, Germany, Italy and China. Approximately 25% of these suppliers were considered to be 'significant suppliers' (meaning a total annual spend of £10,000 or more) and collectively represented approximately 75% of our annual supplier expenditure.

All suppliers are evaluated through our Supplier Assessment Procedure prior to being added to our Approved Supplier List. This qualification process may include supplier questionnaires or audits of supplier facilities. Each supplier in our supply chain is held to high expectations and are encouraged to have appropriate management systems in place and take steps to comply with this policy.

### **Policies and Procedures**

Altomed has a culture of openness, integrity and accountability. We require our employees to act fairly in their dealings with fellow employees, customers,



suppliers and business partners. We are committed to preventing modern slavery and human trafficking in our operations and in our supply chains. The company has a range of policies and procedures which mitigate the risk of modern slavery.

## **1. Labour Standards Assurance System (LSAS) Policy**

Altomed's LSAS Policy provides a strict set of ethical values to guide us in our business dealings and the standards for doing business with Altomed.

Altomed has adopted this policy and expect all suppliers to adhere to the same ethical principles.

Altomed continually reviews and improves this policy, taking into consideration changes in legislation, and expects suppliers to continually improve their respective policies and provide sufficient resources to meet these policies.

This policy covers all sections of the Labour Standards Assurance System, as set out by the NHS, these include Labour Standards Policy, Management Representative, Status Review, Legal Requirements, Roles and Responsibility, Training, Communication, Documentation, Operational Control, Supply Chain Management, Emergency Response, Performance Measurement, Corrective Action, and Management Review.

The main principles of the LSAS policy cover:

- Laws and Ethical Standards and specifically Child Labour
- Forced Labour
- Compensation and Working Hours
- Freedom of association
- Discrimination
- Health & Safety
- Business Continuity Planning

- Improper Payments/Bribery
- Environment
- Business Partner Dialogue

Altomed checks compliance with its own standards and encourages suppliers to implement their own binding guidelines for ethical behaviour.

## **2. Whistleblowing Policy**

Altomed has a whistleblowing policy which allows employees to raise concerns in confidence, anonymously (where permitted by law) and independent of their company. This policy is relevant when any employee has a concern about unlawful conduct, financial malpractice or damage to employees, the public or the environment.

The whistleblowing policy enables employees, suppliers, and customers to raise their concerns about any form of malpractice at an early stage and in the right way for concerns where the interests of themselves, others or the organisation are at risk. The details of the originator of any reports are kept confidential and will not be disclosed without the employee's consent

Any suspected or confirmed incidents of modern slavery or human trafficking can and should be reported through the whistleblowing service. No suspected or confirmed cases of modern slavery have been reported to date.

## **3. Due Diligence**

Altomed performs due diligence on all of its suppliers and detailed information relating to Labour Standards is collected and reviewed before new business is commenced.

Altomed's commitment to respecting human rights and preventing modern slavery is outlined in the supplier documentation which is entered into with all suppliers. This documentation states that all suppliers are required to comply with modern slavery laws and respect human rights, and that failure to do so could void supplier agreements.

## **4. Training**

Annual LSAS training via an accredited provider for key individuals with responsibility for interacting with suppliers to the business. Individuals with management or day to day responsibility for these activities are currently accredited to LSAS Levels 1, 2, 3 and 4. LSAS training is actively encouraged to our suppliers to improve their understanding of labour standards requirements.

## **5. Future**

Altomed is committed to continually demonstrate further improvements to our procedures and policies. We are committed to ongoing training to raise awareness amongst our company and employees. We have maintained our Level 2 accreditation of LSAS with completion of annual LSAS audit and we continue to aim to demonstrate additional improvements to our system. Altomed also strives to continuously improve our management systems and our performance in the areas covered in this statement and promotes the same from our suppliers.

## **6. Compliance Statement**

As Managing Director, I will continue to lead this important agenda for Altomed.

A copy of this Statement is available at the Modern Slavery Registry which is maintained by the Business & Human Rights Resource Centre.

This statement was approved by the Board of Altomed and signed on its behalf by:

**Nico Master**  
Managing Director

**September 2021**