



MODERN SLAVERY STATEMENT

Distinctive Medical Ltd is fully committed to combatting modern slavery and human trafficking within our business and supply chain. This statement is made in accordance with the Modern Slavery Act 2015.

Although our annual turnover is below £36 million, and we are not legally obligated to publish a modern slavery statement, we actively support our clients in meeting their compliance requirements under the Act. We are also dedicated to contributing to the eradication of modern slavery in UK supply chains.

Following an internal review of our business and, where reasonably practicable, our supply chain, we can confirm the following:

1. No offences related to modern slavery or human trafficking have occurred within our business.
2. We have engaged with our direct suppliers and are confident that no such offences are taking place within their operations.
3. Our review of the supply chain has not identified any evidence of modern slavery or human trafficking, to the extent that was reasonably possible.

Our Organisational Structure

Our company structure ensures efficient management, led by the Board of Directors and chaired by our Managing Director. The Board provides strategic direction, while the MD oversees daily operations and ensures that strategic goals are achieved. With the support of our 13 staff members in the UK, we maintain high-quality service delivery and efficient resource management. This streamlined structure promotes accountability and effective communication throughout the organisation.

We have implemented several procedures that address modern slavery and human trafficking, establishing a clear framework for ethical behaviour, workplace standards, and employee rights. These policies and procedures are detailed in the employee handbook and accessible to all staff.

- Harassment and Bullying Policy.
- Equal Opportunities Policy.
- Grievance Procedure.
- Disciplinary Procedure.
- Whistleblowing Policy
- Health and Safety at Work.



By implementing these policies, the company creates a protective and supportive work environment where employees are treated fairly, have clear mechanisms to report and resolve issues, and are safeguarded against exploitation and abuse. These efforts play a crucial role in mitigating the risks of modern slavery and human trafficking.

Our Supply Chain

Distinctive Medical Ltd has built strong, long-standing relationships with suppliers from countries such as the USA, Spain, and the United Kingdom. This global network is essential to delivering high-quality products to our clients.

We apply a risk assessment process to evaluate modern slavery risks, categorising both current and prospective suppliers into four levels: A, B, C, and D.

This categorisation is based on factors such as supplier criticality, capability, level of expenditure, and the country and industry in which they operate.

Currently, we have classified our top three suppliers and plan to extend this assessment to all suppliers in the near future.

Importance	High		SUP-01	SUP-02	
	Medium	SUP-03			
	Low				
A	C	Low	Medium		High
B	D				
Risk					

Our Due Diligence Processes

We carry out rigorous due diligence with our suppliers to ensure compliance with anti-slavery standards. This process follows the risk categorisation for the four levels mentioned in the assessment:

Level A

- Comprehensive annual audits: Focus on modern slavery risks.
- Contractual clauses: Contracts include clauses mandating adherence to anti-slavery policies.
- Documentation: Maintain detailed records of all audit findings.



Level B

Sup-01 & Sup-02

- Annual audits: Conduct audits via email, requesting relevant documentation.
- Self-assessment questionnaires: Require suppliers to complete onboarding questionnaires covering labour practices and working conditions.
- Documentation: Keep records of all communications, findings, and documentation.

Level C

Sup-03

- Moderate onboarding: Implement a supplier onboarding process that includes basic checks for modern slavery risks.
- Regular audits: Conduct audits every 2-5 years to ensure ongoing compliance with labour standards.

Level D

- Moderate onboarding: Supplier evaluation includes targeted questions on modern slavery to assess compliance and risk levels.

Training on Modern Slavery

We are planning for regular training for our staff to help them identify and report potential instances of modern slavery. This includes awareness sessions on modern slavery risks and indicators.

Board Approval

This statement has been approved by the Board of Directors and signed by one of the Directors.

Signed



Julie Delooze

Director 1/10/2024