

## **Modern Slavery Policy Statement**

### **Introduction**

This document contains the Sumner Group Health Ltd (SGH) policy and information on modern slavery.

This policy statement is relevant to SGH itself, our contractors, partners, sub-contractors, suppliers, freelancers, members of the public, and other parties engaged with SGH's business.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

### **SGH Acknowledgement**

SGH acknowledges that modern slavery is a crime and a violation of fundamental human rights. We understand that it takes various forms, such as slavery, servitude, forced and compulsory labour; and human trafficking—all of which sanction the deprivation of a person's liberty by another to exploit that person for personal or commercial gain. SGH is building knowledge and competency in this area and understanding what is required to successfully implement the modern slavery act. Most importantly, SGH aims to be effective in applying these practices through Tier 1 and all other subsequent tiers.

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

Sumner Group Health Limited is a subsidiary of Sumner Group Holdings Limited.

Director: David Sumner

Main products: PPE products (e.g., gowns, masks, medical examination gloves, needles, sanitizers, syringes, visors, wipes, etc.)

Main services: nurse recruitment

Supplier business relationships: long term, production based

Number of SGH employees: 45

Locations: Globally diverse workforce (e.g., Far East, Middle East, Europe, the Americas)

2021 – First policy statement on “Modern Slavery” for SGH

SGH's internal cross departmental senior leadership members for modern slavery: digital strategy and transformation, executive team, finance, operations, and procurement.

Resources used for modern slavery principles and implementation:

1. Ethical Trading Initiative Base Code
2. Dhaka Principles for Migration with Dignity
3. International Labour Organisation's (ILO) 11 Indicators of Forced Labour
4. ILO General Principles and Operational Guidelines for Fair Recruitment
5. UN Guiding Principles on Business and Human Rights
6. OECD Due Diligence Guidance for Responsible Business Conduct

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Sumner Group Health (SGH) is a specialist provider of health care services (i.e., training, resourcing) and, more recently, products (i.e., PPE & vaccines). Our mission is to be a trusted partner to the global health sector and the communities in which they serve, and policy makers in the coordinated effort to overcome the world's "urgent health challenges" in delivering sustainable health and social care systems.

Driven by our continuous "learning and improvement" philosophy (PDCA), we commit to continually improve our systems to meet our vision, values, and the expectations of those affected by what we do. SGH will ensure that our responsibilities for modern slavery are clearly allocated, understood, monitored, and fulfilled; and legal requirements will be regarded as the minimum standard to be achieved. Currently, our supply chain map is at Tier 1. This includes SGH, main production facilities in China, and logistics' suppliers for sea and air freight.

Resulting from our business operations, SGH acknowledges its obligations on modern slavery to our employees, stakeholders, and the communities in which we work.

### **Policies**

Sumner Group Health (SGH) has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships. We are committed to implement and enforce effective systems and controls that ensure modern slavery is not present anywhere in our own business or in any of our supply chains.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

As part of our contracting processes, we expect the same high standards from all of our contractors, suppliers and other business partners. In the coming year, we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children; and, we expect that our suppliers will hold their own suppliers to the same high standards.

This applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

#### **SGH Related Policies include:**

Child Labour Policy

Employee Code of Conduct

Human Rights Policy

Migrant Workers' Policy

Procurement Policy

Recruitment Policy

Staff Training and Awareness Policy  
Supplier Code of Conduct  
Whistle-blowing and Anonymous Reporting Policy  
Worker Welfare and Living Standards Policy

For additional policy statements on modern slavery, please refer to SGH's Supplier Code of Conduct.

**Responsibility for the Policy**

SGH has the overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with its contents.

SGH has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries on its contents, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Personnel are given adequate and regular training on this policy and the related issues of modern slavery in supply chains.

SGH personnel are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the "Managing Director."

**Compliance with the Policy**

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

SGH personnel must ensure that they read, understand, and comply with this policy.

SGH personnel are required to avoid any activity that might lead to, or suggest, a breach of this policy.

SGH personnel are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

SGH personnel must notify their line manager OR a company director OR report it in accordance with SGH's Whistle-blowing and Anonymous Reporting Policy as soon as possible, if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.

SGH personnel should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If any SGH personnel are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must bring it to the attention of their line manager or company director.

SGH aims to encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers

any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If any SGH personnel believe that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, and, as an employee, it should be raised formally using our Grievance Procedure, which can be found in the current employee handbook.

## **Risk Assessment, Prevention and Mitigation**

Before publication, SGH's modern slavery risk register is reviewed by the Board, and SGH will continue to review quarterly.

Through our risk assessment, we identified our main production facilities in China as being high-risk. Subsequently, we are conducting a SEDEX 4-pillar SMETA audit to ensure the modern slavery standards are being followed and to highlight any gaps. These gaps will allow us to mitigate any risk and prevent any further occurrences.

Addressing the risk of forced labour and child labour form the basis of our ongoing analysis of modern slavery risk across SGH operations and supply chains, and we apply this to different situations and contexts to inform a risk-based approach for our due diligence and to prioritise our efforts.

Processes to provide oversight of modern slavery risk across the SGH supply chain include:

### **Risk Assessment in Production Markets**

(e.g., SEDEX 4-pillar SMETA audit in our main production facilities in China)

### **New Market Sustainability Risk Assessment**

All potential new retail and production markets are assessed using a risk-based approach before deciding to set up operations. The sustainability risk assessment includes both an environmental and a social perspective. For high-risk markets, stakeholders (global and local) are consulted and involved in reviewing the findings, providing additional input, and helping guide us in actions to address critical issues.

### **Supply Chain Management and Monitoring**

SGH focuses on building strong long-term relationships that are based on trust and transparency. To ensure that our requirements are met, including the absence of child and forced labour, and to enable us to monitor the implementation of these requirements in our "Supplier Code of Conduct," it is crucial for us to know where the production/manufacturing of our products takes place.

## **Due Diligence Process**

Currently, SGH is following our due diligence process to identify areas of risk of modern slavery. To demonstrate this, and as noted above, we are working with our main production facilities to ensure their compliance to their contract, which addresses modern slavery. In addition, SGH is conducting industry standard audits (i.e., SMETA) to increase transparency of supplier practices.

Furthermore, to expound our due diligence approaches, over the next 12 months through 2022, SGH commits to the Key Steps/Smart Objectives for 2021/2022, as noted below:

### Key Steps/Smart Objectives for 2021/2022

1. SGH commits to conducting 4-pillar audits on our high-risk country suppliers for Tier 1.
2. SGH commits to complete risk assessments on our Tier 1 suppliers and to implement mitigation plans on the highest risks.
3. SGH commits to work with organizations that will provide transparency on our supply chain.
4. SGH commits to complete Tier 1 and Tier 2 mapping.
5. SGH commits to establish core KPIs for tracking progress on modern slavery best practices.
6. SGH commits to develop a modern slavery working group that includes our internal teams and our suppliers across the supply chain.
7. SGH commits to strengthening competencies and heightening staff awareness on modern slavery “focused” topic areas for global and local SGH personnel.

### Effectiveness

Please refer to “Key Steps/Smart Objectives for 2021/2022” – Line item 5. Establishing core KPIs on establishing modern slavery best practices.

### Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. Updates are provided using established methods of communication between the business and SGH personnel.

SGH employees are trained continuously in our policies, including those related to human rights, and our company values. Specific e-learning courses on sustainability-related themes are available to our employees via web-based platforms, including e-learning modules on modern slavery and its various elements (e.g., child labour, collective bargaining, debt bondage, forced labour, freedom of association, human rights, working hours, etc.).

In addition, training courses are customised for different roles and functions. In-depth training on the resources, such as those listed above on modern slavery principles and implementation (e.g., International Labour Organisation’s (ILO) 11 Indicators of Forced Labour, UN Guiding Principles on Business and Human Rights, etc.) and the implementation of SGH’s Human Rights Policy is customised for key roles and functions within the group.

Please refer to “Key Steps/Smart Objectives for 2021/2022” – Line item 7. Strengthening competencies and heightening staff awareness on modern slavery “focused” topic areas for global and local SGH personnel.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. SGH may terminate relationships with other individuals and organisations working on our behalf if they breach this policy.

Signed for by David Sumner and on behalf of Sumner Group Health Limited  
7<sup>th</sup> July, 2021