



Modern Slavery and Human Trafficking Statement

May 2018

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st April 2017 to 31st March 2018.

Section 54 of the Modern Slavery Act 2015 requires commercial organisations with a turnover of at least £36m to prepare a Slavery and Human Trafficking Statement for each financial year. Henderson Biomedical's turnover is below the threshold of £36m. However, as stated in section 2.1 of our Ethical Policy, Henderson Biomedical is committed to opposing slavery in all forms.

This statement sets down Henderson Biomedical's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Henderson Biomedical which are as follows:

Henderson Biomedical is a national provider of service, repair and calibration to laboratory equipment. Henderson Biomedical is headquartered in Lower Sydenham, London but we employ a network of carefully selected Field Service Engineers to carry out work at our customer's site. Our supply chain consists of UK, European and global suppliers of laboratory equipment.

The Company currently operates in the following countries:

- United Kingdom:
Service, repair, calibration and sale of laboratory equipment.
- Republic of Ireland:
Service, repair, calibration and sale of laboratory equipment.

Henderson Biomedical has carried out a process to assess whether the activities of

suppliers are at high risk of modern slavery or human trafficking. We are committed to identifying and addressing risks in our supply chain by:

- Ensuring all suppliers provide a Modern Slavery and Human Trafficking Statement, which is kept on file.
- Carrying out a comprehensive risk assessment of each new and existing supplier.
- Conducting spot checks on the factories of suppliers based in high risk areas.
- Conduct face-to-face, private interviews with workers at these factories based in high risk areas.
- Carrying out an annual review questionnaire for suppliers to understand suppliers' self-assessment of slavery and human trafficking issues. The information provided from this questionnaire is kept on file and used as part of our risk assessment.

High Risk Activities

After carrying out the above process, Henderson Biomedical did not identify any activities to be at high risk of modern slavery. However, this may change over time, so we are committed to annually reviewing this Statement annually.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 **Policies:** The Managing Director is responsible for creating and reviewing policies. The process by which policies are developed is taking best practices into consideration and adapting to the needs of the Company.
- 1.2 **Risk assessments:** The Quality and Compliance Manager is responsible for risk assessments in respect of human rights and modern slavery by a process of internal auditing on a quarterly basis.
- 1.3 **Due diligence:** Senior Management is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to read this policy annually. In addition to this, all staff are required to watch a series of online videos developed by the [Gangmasters and Labour Abuse Authority \(GLAA\)](#) and the [Independent Anti-Slavery Commissioner \(IASC\)](#) to help with spotting the signs of modern slavery.

All staff are also provided with a range of guides supplied by the Home Office.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy:** Referring to section 17.5 of the Employee handbook - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Employee Code of Conduct:** Referring to section 10 of the Employee Handbook to - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy:** The Company's CSR policy summarises how we manage our staff, customers, our environmental impacts and how we work responsibly with suppliers and local communities.
- 2.4 **Ethical Policy:** The Company's Ethical Policy summarises our view on human rights, workers rights, environmental issues as well as how we interact with suppliers and partners.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes a) building long-standing relationships with suppliers and making clear our expectations of business partners, b) evaluating the modern slavery and human trafficking risks of each new supplier and c) invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all staff to have completed training on modern slavery and by carrying out an annual supplier audit in line with our ISO 9000 accreditation.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Managing Director endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Document Control

Date	Revision/Amendment Details and Reason	Author
2/1/2016	Introduction of Anti Slavery Policy	AH
3/12/2017	Alternation of section in Policies	GM
2/5/2018	Review of policy. Additional training guides	AH



Alex Henderson
Managing Director

Dated 2/5/2018

Next review: 1/4/2019 or earlier if required.

This Anti Slavery Policy is to be read annually by all staff