

Modern slavery statement

Organisation

This statement applies to PDI EMEA Ltd (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2023 (1st January 2023 – 31st December 2023). This statement was reviewed and approved by David Gueundjian on February 1st, 2024.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the countries where our employees are situated.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the supply of medical devices from various suppliers in both the United Kingdom and Italy. We understand that the Organisation's first-tier suppliers are intermediary traders and therefore, have further contractual relationships with lower-tier suppliers.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to in its medical devices supply chains because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Adhere to relevant legislation surrounding forced and bonded labour and may choose to sign up to and/or adhere to best practice industry initiatives and codes.
- Ensure that business partners are aware that they should not use forced or bonded labour.
- Not use materials or services produced through forced labour.
- Ensure that employees work voluntarily and not because they have been threatened or intimidated in any way.

- reviewing your supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- measures in place to identify and assess the potential risks in its supply chains
- undertaking impact assessments of its services upon potential instances of slavery
- creating action plans to address risk to modern slavery
- any actions taken to embed a zero-tolerance policy towards modern slavery
- any training provided to staff on modern slavery.

Policies

The Organisation has the following policies which further define its stance on modern slavery modern slavery policy, a corporate social responsibility policy and recruitment policy.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer (HR Manager), to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

This statement is signed by David Gueundjian, President & CEO of PDI International, on February 1st, 2024.