



## Revised Modern Slavery Statement 2025

This statement applies to PDI EMEA Ltd (referred to in this statement as 'PDI'). The information included in the statement refers to the financial year 2024 (1st January 2024 – 31st December 2024). This statement was reviewed and approved by David Gueundjian on 22<sup>nd</sup> February 2025.

**Definitions** PDI 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 or the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or having restrictions placed on freedom of movement

### Commitment

PDI acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. PDI understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains. PDI recognises its responsibility to respect human rights throughout all areas of its operations, including its supply chain, and to act in a responsible and ethical manner. The company is committed to ensuring that people are treated with dignity and respect. The organisation is committed to ensuring there is no slavery or human trafficking in its business and to promoting our commitment within the supply chain.

### Our Approach

PDI complies with all stated requirements and recommendations detailed in the Modern Slavery Act 2015 and acts with the utmost due care and attention to reduce modern slavery where it has the control to do so. Our approach is multi-faceted.

### Accountability

The HR Manager is the accountable person for overseeing the management and mitigation of modern slavery risks within PDI. This person liaises closely with our Procurement department periodically to ensure that internal policies and practices are encouraged, and risks that are identified are treated with the urgency and respect they deserve.

### Understanding of Modern Slavery Risks and Issues in the Healthcare Sector

The healthcare sector, though often less directly associated with traditional forms of labour exploitation, faces modern slavery risks, particularly in areas such as:

- **Supply chain:** most of PDI's critical suppliers are large international companies in Europe with their own modern slavery policy statement and policies. For the smaller ones, and for those outside Britain and Europe, we have mapped geographically to identify potential risks.

### Wider workforce considerations

- We can confirm that **72%** of our supply chain suppliers are based within the UK.

To ensure risks are effectively monitored, we implement KPIs. As part of our supplier management program, supplier audits may be necessary from time to time. Modern slavery forms part of any supplier audit. Where an audit has not been conducted, annual confirmation of supplier commitment, based on PDI modern slavery principles, is performed.

## **Policies and Practices to Mitigate and Manage Modern Slavery Risks**

- **Policies: Modern Slavery Policy:**
  - We maintain a robust modern slavery policy, clearly stating our zero-tolerance approach to forced labour, human trafficking, and any form of exploitation. This policy incorporates our broader policies/statements on six areas identified below, is aligned with DEFRA's commitment to eradicating modern slavery from all supply chains and is regularly reviewed and updated. The policy is aligned with the UN Guiding Principles on Business and Human Rights
  - PDI commits to upholding internationally recognised human rights principles encompassed in the Universal Declaration of Human Rights and the ILO (International Labour Organisation's) Declaration on Fundamental Principles and Rights at Work.
    - **Child labour policy**
    - **Human rights policy**
    - **Recruitment policy**
    - **Supplier Management process**
    - **Working Time Directive**
    - Migrant worker policy is integrated into our **ethics policy** as it not so relevant to our industry
  - We operate in full compliance with local wage/hours and benefits laws e.g. working time directive, minimum wage legislation.
  - Our policy has been designed using the Core Coalition Beyond Compliance Guide.
- **Supplier Code of Conduct:** We encourage all PDI Suppliers to adhere to a code of conduct which includes compliance with international labour laws and anti-slavery legislation and section 54 of the Modern Slavery act 2015.
- **Practice - supplier Due Diligence:** Prior to engagement, suppliers undergo vetting to ensure they do not engage in or tolerate any form of modern slavery through inclusion of compliance questionnaires in supplier agreements or checking that those policies already exist in the suppliers' reciprocal agreements.
- **Ongoing Monitoring:**
  - Through periodic audits of our suppliers, focusing on those operating in high-risk regions, to ensure ongoing compliance with our anti-slavery policies.
  - Our current compliance rate KPI for tier one suppliers is 63%. Our goal is to achieve a **50%** compliance rate among all tier-one and tier-two suppliers within **12** months.
- **Wages and Hours:**
  - All workers and contractors are paid the national minimum wage or above and work less than 48 per week over a 17-week period defined within the Working Time Directive.
  - We compensate employees relative to the industry and or local labour market
  - We operate in full compliance with local wage/hours and benefits laws e.g. working time directive, minimum wage legislation.
  - We review our KPIs annually to ensure continued compliance.
- **Recruitment Policy:** Our recruitment policy highlights our relationship with staffing and recruitment agencies in the country, which helps prevent the exploitation of undocumented workers.
- **Employment Contracts:** Ensure all staff have clear, legal employment contracts outlining their rights and responsibilities.
- **Identity Verification:** Implement robust identity verification processes to prevent using forged or fraudulent documents.

- **Staff Welfare Monitoring:** Our HR department and functional leaders lead our staff welfare, which includes:
  - **Grievance Mechanisms:** This focuses on establishing confidential and accessible grievance mechanisms for staff to report abuses or concerns related to modern slavery within the workplace.
  - We recognise and support an employee's right to raise concerns (anonymously if they wish) about any element of their working relationship.
  - Any employee raising a genuine concern will not be subject to detriment.

### Measures to Identify, Mitigate, and Manage Modern Slavery Risks

To effectively manage modern slavery risks associated with this contract, PDI implement the following measures:

- **Identification and Assessment:** We conduct comprehensive risk assessments (aligned to the Responsible Business Alliance best practice) across our supply chain, mainly focusing on **critical tier-one** suppliers based in specific geographical regions. These assessments help identify potential risks of forced labour and exploitation.
- We aim to complete risk assessments for **100%** of identified high-risk suppliers by July 2026.
- **Supply Chain Mapping:** We will map our supply chain to gain visibility into other tiers, ensuring that we can identify and address any modern slavery risks, both upstream and downstream. This transparency is critical to meet our requirement for supply chain accountability.
- Our goal is to achieve **80%** visibility of tier-one and tier-two suppliers within 12 months.
- **Mitigation Strategies:** We implement enhanced due diligence for adherence to our modern slavery policies, including possible termination for non-compliance.

### Collaboration with Charities and Social Enterprises

To address modern slavery risks effectively and in line with our priorities, PDI will collaborate with various stakeholders:

- **Charities and Social Enterprises:** We will engage with Hope for Justice to gain insights, conduct training, and assist in monitoring supply chains for any signs of forced labour or exploitation.
- **Our KPI** is to train **100%** staff on modern slavery, labour rights and best practices by December **2025** including awareness for all front-line staff and management training for all managers and leaders associated with the healthcare business.
- **Businesses:** Where possible, collaboration with other healthcare companies will enable us to share best practices, particularly in supply chain transparency and labour rights enforcement, addressing common challenges in the sector.

### Influencing Staff and Supply Chain on Modern Slavery Risks

Creating a culture of awareness and proactive engagement with modern slavery risks is a priority for PDI. The following measures are implemented:

- **Training and Education:** We conduct mandatory training for all employees, particularly those in procurement and supplier management roles, to help them identify and mitigate modern slavery risks. This training includes the Home Office's modern slavery awareness booklet, which provides key facts about modern slavery, including definitions, prevalent types in the UK, signs to spot, and the barriers victims face in reporting.
- **Our KPI** is for **100%** of PDI employees to be trained and **75%** of key supplier representatives to have been informed of the Home Office's modern slavery awareness booklet by the end of **2025**, ensuring alignment with capacity building within organisations.

**Communications:** We will regularly communicate, including an annual update on the importance of addressing modern slavery risks to all employees, using multiple platforms, including our newsletter, intranet posts, management meetings, and induction, ensuring that our internal culture aligns.

**External Communications:** We will maintain transparency with our stakeholders, by regularly reporting on our efforts to combat modern slavery and sharing success stories from our initiatives via our annual Modern Slavery Statement; this will include, but not be limited to

- Organisation structure and supply chains
- Policies relating to slavery and human trafficking
- Due diligence controls, including grievance mechanisms
- Risk assessment and management
- Key performance indicators that measure the approach's effectiveness annually
- Training on modern slavery and human trafficking.
- KPI: We will publish an annual modern slavery statement on our website, outlining our progress and efforts within 12 months of this statement.

### **Continuous Improvement**

Using our findings from audits and risk assessments, our HR Manager will lead on continually improving practices and policies, closing any potential gaps that might allow modern slavery to occur. Our actions will be included in our annual modern slavery statement.

### **Slavery Compliance Officer**

PDI 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 PDI'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 of PDI INTERNATIONAL, on 22<sup>nd</sup> February 2025.