



MODERN SLAVERY STATEMENT

Osteotec Limited ('we' or 'our') is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015.

We oppose slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our business or in our supply chains.

About us

Osteotec Limited is a privately owned UK-based manufacturer and distributor focused on orthopaedic extremities medical devices. We provide industry-leading, specialist orthopaedic extremities solutions and superior services to healthcare professionals that improve patient outcomes, developing a comprehensive product portfolio and partnering with leading global manufacturers. Our vision is to be the partner of choice for orthopaedic extremities through our unparalleled expertise, outstanding service and tailored solutions.

Our annual turnover is under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act 2015, we are making this statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

Our supply chains

The key areas in which we engage suppliers are:

- manufacture and supply of medical devices;
- supply of non-medical equipment and consumables;
- clinical studies;
- testing of medical devices;
- sterilisation of medical devices;
- human resources;
- finance;
- information technology;
- packaging and labelling materials;
- logistics; and
- facilities management and maintenance.

Policies

As part of our commitment to combating modern slavery and human trafficking, we have implemented the following policies:

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- Anti-slavery and human trafficking policy. This policy sets out our stance on modern slavery and human trafficking, and explains how employees and suppliers can identify any instances of this and where they can go for help.
- Whistle blowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Anti-bribery policy. We have a zero-tolerance to any form of bribery by our employees, agents or consultants or any other person or body acting on our behalf. This policy demonstrates our commitment to maintaining the highest standards of professional and ethical conduct throughout our business and in our supply chain.
- Company handbook. This reflects our commitments to ensure that we respect the rights of our employees with regards to freedom of association, payment of a fair wage, working hours, equal opportunities, freedom of intimidation and a safe and healthy working environment.

We also make sure our suppliers are aware of these policies and adhere to the same high standards.

Due diligence and risk assessment

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- We assess our suppliers to ensure that they are committed to ethical labour practices. The large majority of our suppliers are located in countries where the risk of modern slavery and human trafficking is low.
- We ensure all our suppliers adhere to our anti-slavery and human trafficking policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.
- We continue to utilise effective systems to protect whistleblowers.
- We do not employ contract workers.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistleblowers.

If we become aware of a failure to comply with our anti-slavery and human trafficking policy, depending on the behaviour, we may choose to terminate our relationship with our suppliers, or elect to work with the supplier to resolve such issues.



Effectiveness in combating slavery and human trafficking

We use the following key performance indicators to measure how effective we have been at ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains:

- percentage of suppliers vetted for ethical labour practices;
- percentage of suppliers audited by our third party auditors in the past year;
- number of reported breaches in the past year; and
- percentage of staff receiving annual training on identifying and addressing the risk of slavery and human trafficking in our business.

Training

We invest in educating our employees to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are also educated on the benefits of using stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

We also require our business partners to provide training to their staff, suppliers, and providers, or provide them with training materials where they do not have any existing training programmes.

Sign-off

We will continue to build on the progress made to date. Our auditing of our suppliers and sub-contractors will continue, and data obtained from this will be used to identify areas to focus on in future years. We recognise our policies require continuing monitoring and review and we will continue to proactively identify and manage risks in our business and supply chain.

No incidents of modern slavery have been identified within our business or supply chain in financial year 2021.

Approval

This voluntary slavery and human trafficking statement is made in connection with section 54(1) of the Modern Slavery Act 2015, for the financial year ending 2021. It was approved by the board on 10 March 2022.

Signed on and for behalf of Osteotec Limited

Signature: 
Name: Matthew Woods, Director
Date: 10 March 2022