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## Modern Slavery Policy

### 1. Purpose

This policy aims to ensure that all employees, contractors, and business partners associated with Cardiologic Limited adhere to ethical standards in line with the **Modern Slavery Act (MSA) 2015**. It outlines the company's commitment to preventing modern slavery, servitude, forced or compulsory labour, and human trafficking across all operations and supply chains. By establishing clear responsibilities and procedures, this policy seeks to create a culture of transparency, integrity, and respect for human rights.

### 2. What is Modern Slavery

Modern slavery encompasses a range of exploitative practices that deprive individuals of their freedom and basic human rights. The **Modern Slavery Act (MSA) 2015** defines four activities:

1. **Slavery:** Exercising powers of ownership over a person.
2. **Servitude:** The obligation to provide services is imposed through coercion.
3. **Forced or Compulsory Labour:** Work or services are exacted from a person under the menace of any penalty and for which the person has not voluntarily offered themselves.
4. **Human Trafficking:** Arranging or facilitating the movement of individuals with a view to their exploitation.


This policy is designed to address all four forms of modern slavery and ensure the company complies with legal and ethical standards.

### 3. How Is This Policy Relevant to Us?

While modern slavery may seem distant, it is an issue that affects many businesses, including ours. Preventing exploitation, protecting human rights, and ensuring a transparent, ethical approach to business practices are fundamental to maintaining our reputation, safeguarding our workforce, and complying with relevant laws.

The **Modern Slavery Act 2015** encourages businesses to take an active role in tackling slavery and human trafficking. To fulfil this responsibility, the company will focus on:

- Protecting our workforce by preventing exploitation or trafficking.

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- Taking steps to address risks in our supply chain, particularly in high-risk areas such as:
  - Outsourced services (e.g., cleaning, waste management).
  - Short-term labour hires, particularly in low-skilled roles.
  - Sourcing of raw materials from regions with higher incidences of slavery and trafficking.

#### 4. Responsibilities

##### The Company's Responsibilities


The company is committed to:

- Maintaining clear policies and procedures to prevent exploitation and trafficking.
- Ensuring all recruitment practices comply with legal and ethical standards.
- Closely examining our supply chain to identify and mitigate risks of slavery or human trafficking.
- Setting expectations with suppliers to ensure they adhere to ethical practices, including the MSA 2015.
- Ensuring that all employees are aware of their rights and know how to report concerns.
- Making a clear statement that we take our responsibilities to employees, clients, and suppliers seriously.

##### Managers' Responsibilities

Managers play a critical role in ensuring compliance with this policy. Managers will:

- Be approachable and listen to colleagues' concerns.
- Respond appropriately if a colleague discloses concerns about slavery or exploitation.
- Remain vigilant for signs of slavery, servitude, forced labour, or human trafficking.
- Ensure all employees are provided with a copy of this policy and understand their obligations.

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- Use professional judgment to assess and address any concerns or risks related to modern slavery.

### Employees' Responsibilities

All employees have a responsibility to:

- Stay alert and report any suspicions or concerns regarding slavery or exploitation, whether it involves colleagues or individuals in our supply chain.
- Follow the company's reporting procedure if they believe someone is being exploited or coerced into providing services.
- Understand that failing to report a suspicion or turning a blind eye to exploitation is not acceptable.

### 5. Identifying Slavery


While there is no single profile of a victim of modern slavery, the following signs may indicate that someone is being exploited:

- The individual is not in possession of their own passport, identification, or travel documents.
- The person is acting under the direction or control of another individual.
- They allow others to speak for them when spoken to directly.
- The person is dropped off and picked up from work by someone else.
- They seem withdrawn, frightened, or anxious.
- The person has limited contact with friends or family.
- They show signs of being isolated from the broader community.

These indicators are not exhaustive. If you observe any of these signs or have concerns about a person's situation, please report it to the **Human Resources Department**, who will initiate the appropriate action.

### 6. Risks

The company faces risks related to slavery and human trafficking primarily in the following areas:

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- **Supply Chain:** Certain industries and sectors have higher historical risks of exploitation.
- **Recruitment:** This includes the use of recruitment agencies or direct hiring practices that may not adhere to ethical or legal standards.

We mitigate these risks through:

- Rigorous due diligence on suppliers and contractors.
- Regular audits of recruitment practices.
- Ensuring all recruitment agencies meet the standards set by this policy.

## 7. Procedures

### Anti-Slavery Statement

We are committed to transparency and regularly update our **Anti-Slavery Statement**, which is published and made available to employees, clients, and the public. This statement outlines our approach to preventing modern slavery and trafficking.

### Supply Chain Due Diligence


The company will:

- Ensure all relevant supplier contracts include an anti-slavery clause, prohibiting slavery and human trafficking.
- Perform risk assessments to identify high-risk suppliers or sectors.
- Conduct supplier audits and assessments, focusing on at-risk areas.
- Request anti-slavery statements from suppliers to ensure compliance with our policy.
- If a supplier is found to be in violation of this policy, the company will take appropriate action, which may include terminating the relationship.

### Recruitment Practices

We ensure all recruitment practices comply with the highest ethical standards by:

- Using only reputable and compliant recruitment agencies.
- Ensuring transparency and accountability in the recruitment process.

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- Providing clear contracts and information on statutory rights to all employees.
- Regularly reviewing the recruitment agencies, we work with to ensure they align with our anti-slavery commitments.

If any concerns are raised about potential exploitation during the recruitment process, these will be immediately investigated.

### 8. Reporting Slavery

If you suspect modern slavery or human trafficking, it is essential to report your concerns immediately.

- **In immediate danger, dial 999.**
- For non-urgent concerns, speak to the **Human Resources Manager**, who will guide the next steps, which may include contacting the police or the **Gangmasters Licensing Authority (GLA)**.

Please remember that victims may be afraid to speak out or may not realize they are being exploited. Always err on the side of caution and report any concerns.


### 9. Training

All employees will receive training on this policy and on how to recognize and report signs of modern slavery. This training will be provided during induction and regularly refreshed throughout employment.

### 10. Monitoring and Review

This policy will be reviewed annually to ensure its effectiveness and relevance. We will monitor compliance and update the policy as needed to ensure that all activities within the company align with the Modern Slavery Act 2015 and the company's ethical commitments.

By adopting and enforcing this policy, we are contributing to the global effort to eradicate modern slavery and ensure a fair and ethical workplace for all.

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Change information			
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