

Aquilant's Modern Slavery Policy

Updated: 10 March 2017

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms such as forced and compulsory labour, servitude, slavery and trafficking. Aquilant and all its associated business entities are committed to acting ethically and with integrity in all our business dealings and in all our relationships and to this end are committing to this Anti Modern Slavery Policy.

We acknowledge that every supplier and worker deserves the right to live and work with dignity and respect, in decent and safe conditions and earn fair rates of pay. We have a responsibility to ensure good social and ethical practices within our own operations and within our supply chain.

This policy sets out Aquilant actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and in our supply chains. Aquilant maintains relationships with many different organisations; suppliers, contractors, as well as directly employing large numbers of people. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, we are absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking.

Organisational Structure and Supply Chains

This policy covers all the activities of Aquilant and its associated businesses. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Aquilant and/or any division within Aquilant, to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy.

Aquilant is a division of UDG Healthcare Plc along with Ashfield Commercial and Medical Services and Sharp Packaging Services. UDG Healthcare has operations in Ireland, United Kingdom, USA, Canada, Belgium, Holland, Sweden, Denmark, Finland, Germany Austria, Portugal, Spain, Turkey and Japan.

There are 8 separate legal entities associated with the Aquilant Division, These are: Aquilant Endoscopy Ltd, Aquilant Ltd, Aquilant Northern Ireland Ltd, Aquilant Nederland BK, Aquilant Pharmaceuticals Ltd, Aquilant Analytical Sciences Ltd, Aquilant Medical ROI Ltd and Aquilant Scientific ROI Ltd. Aquilant Ltd based in the UK is then organised into 4 further trading brand names – Aquilant Surgical, Aquilant Interventional, Aquilant Critical Care and Aquilant Orthopaedics.

The Head of Procurement for UDG Healthcare plc has oversight over all Divisional Procurement and works with the Aquilant Head of Procurement who has a reporting line to the Head of Finance and Managing Director. Each associated business unit within Aquilant sources both direct finished goods for resale and indirect services. The procurement team, Functional Heads and commercial sales leads at Aquilant follow a standardised sourcing process for the identification, selection and management of suppliers to the company and is risk managed via our supplier set-up process and controlled by our Compliance function. As part of this process, and to ensure our obligations are met in relation to Modern Slavery, candidate suppliers must meet pre-qualification criteria, in order to be considered for a commercial relationship. One of these criteria is the capability to evidence both the existence of and implementation of a Modern Slavery policy and to be prepared to have the implementation of this policy audited by us. This is a dynamic process, by which our Procurement and Compliance team monitor suppliers to ensure ongoing compliance.

Responsibility

The Quality and Compliance department is responsible to ensure that the Anti-Slavery policy is dispersed throughout our employee network and that all appropriate individuals have read and understood the policy.

Aquilant and its Procurement and Compliance teams are responsible for ensuring that all dealings with suppliers, whether contractual or not, comply with this policy.

Aquilant adheres to a Recruitment & Equality Policy and fully support the principle of equal opportunities in employment and oppose all forms of discrimination on the grounds of colour, race, nationality, ethnic origin, sex, marital status, age, sexual orientation, disability, and political or religious belief.

Aquilant mandates all divisions and head office functions to adhere to recruitment practices that ensure that all terms of employment are voluntary.

We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. Where necessary and if required, we may request demonstration of compliance with this policy.

Where Aquilant sources labour (via agencies or directly) there is a detailed process to follow to ensure every worker is being treated appropriately from a legal and welfare perspective.

Where Aquilant deals with suppliers who manufacture products outside of the UK, we will ensure that that these suppliers comply with any local legislation regarding Ethical Trading and Modern Slavery using pre-qualification criteria as part of the supplier sourcing process. As with our UK suppliers we expect all suppliers outside of the UK who have, or seek to have, a business relationship with Aquilant and/or any associated division within Aquilant, to familiarise themselves with our anti-slavery policy and to act at in a way which is consistent with our anti-slavery policy at all times. If local legislation differs from our own policy, we will encourage best practice and changes to supplier processes and offer support to the supplier on how it might achieve compliance with our Policy.



John Bentley
Managing Director: Aquilant

Aquilant's response to and reporting of concerns raised in relation to suppliers from outside of the UK will be tailored to the local circumstances, legislation, organizations and support mechanisms present in that country.

Aquilant operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Aquilant encourages all our employees to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Company's confidential reporting procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the UDG Healthcare confidential reporting link 'See Something, Speak Out' which is available in the ComplianceCentre website and on request from any of the Quality and Compliance team.

Due Diligence

On an annual basis, the Quality and Compliance department will review, on the ComplianceCentre, the progress of all required training on this Policy. In addition, we will raise awareness of modern slavery issues by it being made available on our website for customers and or internal media for our employees. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

Aquilant will make this policy available to employees, members of the public and other interested parties.