

## Modern Day Anti-Slavery & Human Trafficking Statement

We Penlon Ltd are committed to conducting our affairs in compliance with all applicable laws and regulations and to the highest ethical standards. Penlon also expects our business partners and suppliers to act in a professional capacity that ensures we continue to meet our commitment to responsible supply chain management. Penlon are totally opposed to slavery and human trafficking in all aspects of our global operations, including but not limited to, our supply chain, which forms part of our comprehensive commitment to ethics, laws and social responsibility.

Our Modern Day Anti-Slavery & Human Trafficking Statement reflects our commitment to acting ethically and with integrity in all our global business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our end to end supply of goods and services to customers. Penlon adopts a zero-tolerance attitude to any form of forced labour, slavery or human trafficking, both within our own business, and our supply chain.

### Organisation's Structure

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide education to all members of staff as a mandatory element of our training program. All Directors have been briefed on the subject and Penlon's Executive Board is committed at the highest level in the continuing of conducting of our global affairs in compliance with all applicable laws to the highest ethical standards.

### Our Business

**Penlon Limited** manufactures, distributes and supports medical devices to more than 90 countries, our products and services include anesthesia delivery systems, intubation devices, oxygen therapy and suction equipment and a wide range of anaesthesia Vaporisers for our extensive list of OEM partners.

Our valued clientele include Distributions, Competitors, Pharmaceutical companies, aid agencies, governments, hospitals and clinicians around the world.

### Our Supply Chain & Supplier Adherence to Our Values

Penlon has zero tolerance to slavery and human trafficking. Our supply chain is vetted and investigated prior to approval.

Penlon Ltd continually audits & reviews our critical suppliers to ensure all contractual and ethical obligations continue to be met. To ensure all those in our down-stream supply chain comply with our values we include specific questions in our supplier selection and approval process and further include this within our remote and on-site auditing process.

The upstream Distribution chain is vetted prior to approval and are directed to co-sign a compliance declaration that includes both the laws and Penlon's policies for anti-bribery, anti-corruption, child-labour and anti-slavery / human trafficking.

### **Training**

To ensure a thorough understanding of the risks of modern slavery and human trafficking in our business and supply chain, the Company requires all staff to undertake mandatory annual training.

### **Responsibility for Anti-Slavery Initiatives**

Responsibility for Anti-Slavery Initiatives lies with the HR Director.

### **Due Diligence Processes**

As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our end-to-end supply chain we undertake the following due diligence processes:

- Penlon Ltd continually audits & reviews our practices for checking all employees are paid at least the national living wage and have the right to work.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains through vigilance reviews of both our material and distribution processes and relationships.
- Protect and encourage whistle blowers.

### **Communication of Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Penlon's anti-slavery and human trafficking statement.

Penlon's Modern Day Anti-Slavery & Human Trafficking Statement is available via the company website, company intranet and on request.

Signed:



**Linda Moss, HR Director, Penlon Ltd**

**Date:** 13 JULY 2017