

Modern Slavery Act Statement for the financial year ended 31 December 2018

INTRODUCTION

Fittleworth Medical Limited is committed to ensuring transparency with its suppliers of goods and services and is mindful as to what steps can be taken, where necessary, to combat slavery and human trafficking. We operate within a very low risk industry. Despite this, throughout 2018 we have a strategy for further improving our practices.

ORGANISATION'S STRUCTURE

Founded in 1984, Fittleworth Medical Limited markets and delivers products on Part IX of the Drug Tariff to end users in the UK in the pharmaceutical industry. Fittleworth Medical Limited is an independent, trusted and dedicated home dispensary for ostomy, urology and other medical devices.

The business operates from 38 regional care centres in the UK supported by a National Distribution Centre in Nottingham. Fittleworth Medical Limited employs 201-500 employees. Head office is located at 2 Henry Lock Way, Littlehampton, West Sussex BN17 7FB and the financial year is 1 January – 31 December. Company registration number is 01836221.

OUR SUPPLY CHAINS

Our significant suppliers are well known businesses which supply 'CE' marked products, sourced and approved by the NHS via their registration of products on the NHS Drug Tariff, enabling them to dispense their products throughout the UK. We understand that part of the process to obtain registration requires these suppliers to satisfy the NHS criteria that they are not involved in any slavery or human trafficking. To reduce the burden on suppliers to provide information on a multiple basis (i.e. to the NHS, us and others) our current compliance approach is to allow them to satisfy compliance with the Modern Slavery Act by providing evidence that they have attained the registration of their products with the NHS Drug Tariff. Over time we shall develop a more bespoke approach to remove suppliers' ability to 'piggy back' their conformance in this way. We require our supplies to comply with all UK laws, rules and regulations.

The business:

- does not operate in countries or regions particularly at risk of slavery and human trafficking; and operates in a very low-risk sector

OUR POLICIES AND TRAINING ON SLAVERY AND HUMAN TRAFFICKING

Fittleworth Medical Limited is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls. All our employees are required to read and understand this policy so that they are able to identify behaviour that may indicate human trafficking or use of slave labour. Employees are expected to report concerns and management are expected to act upon them. Employees who fail to follow established guidelines and training are subject to disciplinary action up to and including termination.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we comply with the UK's employment and social security laws. We do not tolerate slavery or human trafficking. As the main suppliers of Fittleworth

Medical Limited are NHS endorsed, this reduces the risk of our exposure to modern slavery and human trafficking.

We have complete management visibility of all employees in the UK. Strict control is operated.

SUPPLIER ADHERENCE TO OUR VALUES

We are planning to develop a programme whereby all our suppliers will be subject to a due diligence process and regular reviews, as part of our consideration to do business with them. For example:

- we will investigate the direct suppliers' supply chain
- we will encourage our suppliers to have a code of conduct that includes avoiding the use of forced labour

If at any point a supplier does not meet its obligations and/or we suspect or know of slave labour and human trafficking issues, we will discontinue the use of that supplier. This is unlikely to happen given the context of the industry and NHS regulated market in which we operate.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

Whilst we will have processes in place it is important to note that through the NHS DT mechanism, as an NHS contractor Fittleworth Medical Limited must purchase, dispense and sell whatever branded (and listed on the NHS Drug Tariff) product is specified by a GP on an NHS prescription form. This means that we may have some difficulty in enforcing our programme. We are in the process of liaising with various parties to ensure that slavery and human trafficking issues are dealt with. This could involve delegation of some checks to the NHS.

We are confident that within our own business there are no issues with slavery and human trafficking and we are committed to preserving our excellent reputation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018.

Gary Bang

Managing Director

For and on behalf of Fittleworth Medical Limited

Date: 1st January 2018