

Anti-Slavery Policy

Improving healthcare for all.

Introduction

This statement must set out the measures an organisation has taken during its financial year to ensure that slavery or human trafficking is not taking place in any of its supply chains or within itself. Irish Hospital Supplies Limited operates in the Republic of Ireland and exports products to its sister Company, Northern Hospital Supplies Limited, which in turn operates within Northern Ireland as part of the UK. Hereinafter this statement applies to the Irish Hospital Supplies Group of Companies (IHS Group).

The provisions of the (UK) Modern Slavery Act 2015 which applies to all bodies corporate and partnerships who (irrespective of where they are incorporated) (1) carry on a business, or part of a business, in the UK supplying goods or services, and (2) have a consolidated global turnover of above £36 million (or Euro equivalent) per annum, are required to prepare and publish an annual “Slavery and Human Trafficking Statement”.

The Republic of Ireland has legislation, primarily the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013. Whilst the consolidated turnover of the IHS Group does not exceed the required amount necessary for the publication of a statement, this statement nonetheless is made on a voluntary basis, in accordance with good practice, sets out the measures the IHS Group has taken during its financial year to ensure that slavery or human trafficking is not taking place in any of its supply chains or within itself. In this context, this statement is to be read as applying to the IHS Group (Republic of Ireland & Northern Ireland).

Modern slavery

Modern slavery is an international crime affecting an estimated 50 million individuals around the world (in 2021), approximately 28 million in forced labour and 22 million in forced marriage. This global issue transcends age, gender and ethnicities; it is estimated that 1 in 3 victims of forced labour are women and girls.

“Modern slavery” refers to the offences of human trafficking, slavery, servitude, and forced or compulsory labour. This can then be considered under five headings:

- the sexual exploitation of adults;
- the trafficking of adults into conditions of labour exploitation;
- the trafficking of adults into conditions of criminal exploitation;
- the trafficking of minors into conditions of sexual, criminal or labour exploitation;
- other forms of exploitation.

“Human trafficking” is a global crime that trades in people and exploits them for profit. “Human trafficking” is defined in the UN Trafficking in Persons Protocol, which supplements the United Nations Convention against Transnational Organized Crime, as “the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, abduction, fraud or deception for the purpose of exploitation”.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. There are several broad

categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.

Modern slavery includes victims who have been brought from overseas and vulnerable people in the Republic of Ireland and UK who are forced to work illegally against their will. This is across many different sectors such as agriculture (including illegal drug cultivation), hospitality (catering, etc.), construction, car wash services, nail bars, retail, and manufacturing.

Estimates of the number of victims of modern slavery in the UK and Republic of Ireland remain high. The 2023 Global Slavery Index estimated approx. 122,000 such individuals in the UK, with approx. 5,000 in the Republic of Ireland. The UK National Crime Agency (NCA) annual National Strategic Assessments of Serious and Organised Crime indicate significantly increasing numbers of modern slavery related cases referred through relevant reporting/referral mechanisms, and numbers of associated police investigations, each year.

It has been estimated that globally modern slavery generates as much as \$150bn – 245bn USD in profits every year with more than a third of these profits generated in developed countries, including the UK, Isle of Man, Gibraltar, Bermuda, and the Republic of Ireland. The (UK) National Crime Agency (NCA) identified in their Indicators of Modern Slavery and Human Trafficking in the Accountancy Sector guidance what they consider the key areas where they deem there to be greater risk and visibility of modern slavery and human trafficking.

This NCA guidance is included as an Appendix in the IHS Group of Companies Anti-Slavery and Human Trafficking Policy so to assist staff (those operating in Republic of Ireland and Northern Ireland) better identify potential real-world risks or actual instances in relation to modern slavery and human trafficking. That NCA guidance has also been considered and has influenced the content of this statement and of the policy, as well as communications and training relating to this topic.

Our structure

Irish Hospital Supplies Limited was founded in 1970 and Northern Hospital Supplies in 1981. Both companies are part of the IHS Group and are family-owned private companies providing and distributing medical, surgical, and electrosurgical products, furniture and equipment to hospitals and medical professionals along with providing solutions and services related on the island of Ireland.

We operate from offices in Bray, Co. Wicklow and Newtownards, Co. Down

Our policy

The policy of the IHS Group is to conduct all of our business in an honest and ethical manner, and to comply with all applicable legislation. We strive to ensure that neither modern slavery nor human trafficking supports our supply chain or our businesses; this objective is implicit in our policies and procedures. We aim for a zero-tolerance approach to violations of anti-slavery and human trafficking laws.

If breaches of these laws are found within our supply chain, we will look to support organisations in their efforts to comply with the applicable legislation. We will review the continuation of business with individuals and organisations found to be involved in slavery, human trafficking, forced or child labour and retains the right to cease business with such individuals and organisations on this basis. We are committed to acting professionally and with integrity in all its business dealings and relationships.

In this context, the IHS Group has a dedicated Anti-Slavery and Human Trafficking Policy. We will review this policy and its operation in practice, at least on an annual basis. Reporting knowledge or suspicion of slavery or human trafficking.

All employees within the firm have a statutory obligation to report knowledge or suspicion of slavery or human trafficking. Any genuine suspicion or knowledge of slavery or human trafficking is to be immediately reported to the Chairperson who will decide what further action, if any, is deemed necessary. Directors and employees who raise concerns of slavery or human trafficking in good faith may do so without fear of discrimination or reprisal. These provisions do not replace any legal reporting or disclosure requirements. Where statutory reporting requirements and procedures exist, these must be fully complied with. Our Anti-Slavery and Human Trafficking Policy also includes contact details for the following in respect of potential external reporting:

The UK Modern Slavery Helpline, which can be contacted at (0044) (0)8000 121 700 or via their website. Alternatively, you can phone the (UK) police on 101 (in an emergency 999). In the Republic of Ireland, if you are a victim of modern slavery or human trafficking, or you spot a suspected case, you can contact the Migrant Rights Centre Ireland at (00353) (0)1 889 7570, or email info@mrci.ie.

In the Republic of Ireland, if you consider yourself, or someone you know, to be a victim of human trafficking, you should report your concerns to the Garda Síochána (Irish police force). In an emergency, you should call 999 or 112. If you wish to report suspicions of human trafficking confidentially you can call the Garda Confidential Line on 1800 666 111 or Crimestoppers on 1800 250 025. You can also email suspicions or concerns you wish to share with the Garda Síochána (Irish police force) to blueblindfold@garda.ie.

During the financial year ended 31/08/2024 the IHS Group, represented by its boards of directors did not receive any reports related to knowledge or suspicion of slavery or human trafficking. We have included appropriate anti-slavery and human trafficking provisions into our Republic of Ireland and Northern Ireland terms of business with clients.

Employment procedures

The IHS Group has procedures in place pertaining to our employment practices.

- Robust recruitment processes in line with Republic of Ireland and Northern Ireland (UK), including “right to work” document checks, contracts of employment, and checks to ensure all employees are above minimum working age (16).
- Market-related pay and reward, which is reviewed annually and linked to benchmarks.

Supply chain / Procurement

We recognise that the IHS Group is exposed to a greater slavery and human trafficking risk when dealing with suppliers of products and services, particularly those who have operations and suppliers in other territories. However, the IHS Group considers that we, and the majority of our suppliers, are not in industries with a high risk of modern day slavery.

From a risk management perspective, we identified areas we needed to develop in conjunction with our supply chain, and a risk-based approach has been developed and is constantly reviewed. This approach includes identifying and reviewing suppliers and vendors that fall within industries and/or countries that can carry higher risk, including in respect of modern-day slavery and human trafficking. The IHS Group has developed measures to assist in the review and management of these areas of risk, including an enhanced supplier and vendor take-on review and ongoing monitoring process.

This review and monitoring process is to take into account the relevant risk factors the (UK) National Crime Agency (NCA) identified in their Indicators of Modern Slavery and Human Trafficking in the Accountancy Sector guidance (with reference to the Appendix of the Anti-Slavery and Human Trafficking Policy).

Learning

We want to help our employees, directors and suppliers to understand more about these issues and understand how to report any suspicions they may have related to modern slavery and human trafficking.

The topic of Modern Slavery, and our associated Anti-Slavery and Human Trafficking Policy, continues to be flagged in the induction training undertaken by new staff members starting with the IHS Group.

We flag each update of this Statement and of the associated Anti-Slavery and Human Trafficking Policy to all staff members.

We continue to consider, on an ongoing basis, ways to further enhance awareness on the issues of slavery and human trafficking and of our Anti-Slavery and Human Trafficking Policy among relevant employees and partners.

Looking forward

We will continue to develop and implement the measures mentioned above in respect of our supply chain. Our approach to modern slavery and human trafficking risk will continue to evolve and we will continue to mitigate these risks through the provisions mentioned above during 2024 and beyond. The IHS Group shall take responsibility for this statement and its objectives, and this statement will be reviewed and updated as appropriate.

Signed,

Brendan Foster

Acting CEO & Chairperson

Sources

1. (UK) Modern Slavery Act 2015 and the guidance issued (PDF - 1575kb) under section 54(9) of that Act and additional (UK) Home Office guidance.
2. (Republic of Ireland) Criminal Law (Human Trafficking) Act 2008 & Criminal Law (Human Trafficking) (Amendment) Act 2013.
3. The 2023 Global Slavery Index. The latest Global Estimates produced by the International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM).
4. International Labour Organization (ILO) Global Estimates of Modern Slavery. (Data and research and highlights)
5. As per various (UK) National Crime Agency (NCA) National Strategic Assessments of Serious and Organised Crime 2019 – 2023.
6. United Nations Office of Drugs and Crime (UNODC) – What is Human Trafficking and Human Trafficking FAQs.
7. International Labour Organization (ILO) Profits and Poverty: The Economics of Forced Labour (forced labour and forced marriage) for the \$150 billion figure. Hope for Justice review and update of ILO \$150 bn figure (to \$245 bn).
8. Indicators of Modern Slavery and Human Trafficking in the Accountancy Sector.
9. UK Modern Slavery Helpline.
10. Migrant Rights Centre Ireland.

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