

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Under the current Modern Slavery Act of 2015, companies with a turnover in excess of £36million are required by law to carry out annual assessments of their Supply Chain and to report publicly on an annual basis.

Whilst Canonbury is not covered by this requirement by reason of its level of turnover, it does believe in the principles of eradicating Slavery and Human Trafficking from within its Supply Chain. The following Policy is therefore an integral part of the Company's ethical approach to all aspects of its activities.

Scope

- 1.1 Canonbury is a private company limited by guarantee, incorporated in England and Wales. It is a Distributor and Sub-Distributor of a range of medical products primarily for use in the UK (including Northern Ireland) podiatry sector and allied professions, both within public and private sector customers.
- 1.2 Our business selects suppliers based on their ability to provide suitably certificated medical products (e.g. those manufactured under ISO13485). The majority of our suppliers are UK and EU based within low risk sectors, as well as a handful of suppliers in higher risk areas of the world (albeit their ISO9001 and ISO13485 status mitigates this risk).

Policy statement

- 2.1 Slavery is illegal and a violation of human rights. There are many forms of Modern Slavery including; forced labour, child labour, exploitation, being controlled by an employer, debt bondage, being physically constrained, being sold or treated as a commodity and having restrictions on freedom of movement. These acts involve a person losing their freedom by being exploited by another for personal or commercial gain.
- 2.2 Canonbury has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We will implement and enforce effective systems and controls to ensure Modern Slavery is not taking place in our own business and supply chains.
- 2.3 We are committed to ensuring our business is transparent, as such we will comply with the disclosure obligations under the Modern Slavery Act 2015.
- 2.4 Canonbury expects our contractors, suppliers and other business partners to uphold high standards in all business practices; as part of the contracting processes, we include prohibitions against the use of staff sourced from forced, compulsory or trafficked labour, anyone held in slavery or servitude. Canonbury expect their suppliers to hold these high standards.
- 2.5 Canonbury will contact all suppliers annually to ensure they continue to comply with the Modern Slavery Act 2015. In addition to this, to check compliance, we will be auditing our higher risk suppliers, as determined by our predetermined criteria (including, but not limited to, country of manufacture; product category; and annual purchase volumes and/or expenditure).
- 2.6 This policy applies to all persons working for, or on behalf of Canonbury, in any capacity. This includes but does not limit the policy applicability to; employees, agency workers, temporary staff, agents, contractors, external consultants, third-party representatives and business partners.
- 2.7 This policy does not form part of any employee's contract of employment and we reserve the right to amend it at any time.

Responsibility for the policy

- 3.1. Canonbury's Board has overall responsibility for ensuring this policy complies with Canonbury's legal and ethical obligations, and that all those under our control comply with it.
- 3.2. Canonbury's Board has primary responsibility for implementing this policy. This includes responsibility for the monitoring of its use and effectiveness, auditing of internal control systems and procedures. The Board is also responsible for updating the policy to reflect any changes in legislation.
- 3.3. Management at all levels of Canonbury are responsible for ensuring those reporting to them understand and comply with this policy, and, are given adequate and regular training on Modern Slavery.
- 3.4. Canonbury employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to a member of the Senior Management Team.

Compliance with the policy

- 4.1. You must ensure that you read, understand and comply with this policy.
- 4.2. All Canonbury employees are responsible for the prevention, detection and reporting of Modern Slavery in any part of our business or supply chains. Employees are required to avoid any activity that might lead to a breach of this policy, and the Modern Slavery Act 2015.
- 4.3. You must notify your line manager as soon as possible if you believe or suspect that, a conflict with, or breach of, this policy has occurred, or may occur, in the future. You can also report any suspected breach by following our Whistleblowing Policy.
- 4.4. Employees are encouraged to raise concerns about suspicions of Modern Slavery in any parts of our business or supply chains at the earliest possible stage (see 3.3).
- 4.5. If you are unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any, or all of, the various forms of Modern Slavery outlined in 1.1, follow 3.3.

Communication and awareness of this policy

- 5.1. This policy is available internally in the Canonbury Employee Handbook and externally upon request.
- 5.2. Our zero-tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them. Suppliers are asked to comply with our Anti-Slavery and Human Trafficking policy from the onset of the relationship. Suppliers who are unwilling to comply will not be on boarded.
- 5.3. Suppliers, contractors and business partners will be required to confirm ongoing compliance with this policy on an annual basis (see 2.5).

Breaches of this policy

- 6.1. Any employee who breaches this policy will face disciplinary action. This could result in action up to dismissal in accordance with the Canonbury's Disciplinary & Grievance policy. We may terminate our relationship with other employees, suppliers and any other associates working with Canonbury if they breach this policy or fail to confirm acceptance of this policy (see 5.3).

If you would like to find out more about the above, please email info@canonbury.com

Canonbury takes responsibility for this Policy Statement and its related objectives and will review and update it in accordance with The Act.

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Canonbury Products Limited