

## MODERN

# SLAVERY STATEMENT

BVM Medical is dedicated to combatting modern slavery and human trafficking within our business and supply chain. This statement is issued in alignment with the principles of the Modern Slavery Act 2015.

Although our business turnover is less than £36 million and we are not legally required to produce a modern slavery statement, we support our clients in meeting their compliance requirements under the Modern Slavery Act 2015. Moreover, we are committed to contributing to the elimination of modern slavery within UK supply chains.

We have examined our own business and, as far as reasonably practicable, the businesses within our supply chain. We confirm the following:

- 1.No relevant offences related to slavery or human trafficking have been committed within our own business.
- 2.We have conducted inquiries with our direct suppliers and are confident that no relevant offences are being committed within those businesses.
- 3.We have reviewed our supply chains, as far as reasonably practicable, and found no evidence of slavery or human trafficking.



## **About BVM Medical and Our Organisational Structure**

Established in 1989, BVM Medical operates within the human health and social work activities sector as a small and medium enterprise (SME). We have built a reputable presence in the medical field by specialising in the distribution of clinical devices to a variety of medical professionals, including interventional radiologists, congenital and structural cardiologists, gastrointestinal specialists, and cardiothoracic surgeons.

Our company structure ensures efficient management, led by the Board of Directors, chaired by the CEO. The Board provides strategic direction, while the CEO oversees daily operations and ensures strategic goals are met. Supporting the Board, the Company Secretary manages governance and compliance. Our Medical Division, along with other departments, operates in the United Kingdom with 17 full-time employees, under experienced leaders who ensure high-quality service delivery and efficient resource management. This streamlined structure promotes clear accountability and effective communication across the organisation.

We have several procedures that address modern slavery and human trafficking by establishing a clear framework for ethical behaviour, workplace standards, and employee rights. The below policies and procedures are explained and available to all employees through their handbook.

- Harassment Policy.
- Equal Opportunities Policy.
- Grievance Procedure.
- Dismissal and Disciplinary Procedure.
- Stress Policy and Procedure.
- Health and Safety at Work.



By implementing these policies, the company creates a protective and supportive work environment to ensure that employees are treated fairly, have mechanisms to report and resolve issues, and are protected from exploitation and abuse. All of this contributes to reducing the risk of modern slavery and human trafficking.

## **Our Supply Chain**

Over the years, BVM Medical has developed strong and productive relationships with suppliers from countries such as the USA, Japan, Korea, China, France, Spain, Italy, Germany, and the United Kingdom. This global network has been crucial in ensuring that we provide high-quality products to our clients.

We follow a risk assessment process for modern slavery risks, categorising our current and future suppliers under four levels: A, B, C, and D. This categorisation considers supplier criticality, capability, and level of spend, as well as the supplier's country and industry. We have classified all our 15 main suppliers and aim to implement the same assessment for all suppliers in the near future.

Importance	High		Supplier 2 Supplier 3	Supplier 1
			Supplier 4 Supplier 5	Supplier 1
	Medium	Supplier 7 Supplier	9 Supplier 8	Supplier 8 Supplier 6
		Supplier 10 Supplier	11 Supplier 8	
	Low	Supplier 12 Supplier	13	
		Supplier 14 Supplier	15	
Α	С	Low	Medium	High
В	D	Risk		



### **Our Due Diligence Processes**

We conduct thorough due diligence processes with our suppliers to ensure compliance with anti-slavery standards. This includes:

#### **Level A**

- Comprehensive yearly audits: Conduct audits focusing on modern slavery.
- Contractual clauses: Include clauses in contracts that require adherence to antislavery policies.
- Documentation: Maintain detailed records of all findings.

#### **Level B**

- Yearly audits: Perform audits via email focusing on requesting documentation.
- Self-assessment questionnaires: Onboarding self-assessment questionnaires that cover labour practices and working conditions.
- Documentation: Keep records of communications, findings, and documentation.

#### **Level C**

- Moderate onboarding: Implement a supplier onboarding process including basic checks on modern slavery.
- Regular audits: Conduct regular audits (e.g., every 2-5 years) to ensure ongoing compliance with labour standards.

#### **Level D**

 Moderate onboarding: Supplier evaluation includes specific questions related to modern slavery to assess their compliance and risk level.



## **Training on Modern Slavery**

We provide regular training for our staff to help them identify and report potential instances of modern slavery. This includes awareness sessions on modern slavery risks and indicators.

## **Board Approval**

This statement has been approved by the Board of Directors and signed by the Operations Manager.

Chetna Chikhlia

Signed

**Chetna Chikhlia** 

Operations Manager 9/7/2024

